

Message

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**From:** Traylor, Patrick [traylor.patrick@epa.gov]  
**Sent:** 5/17/2018 6:51:05 PM  
**To:** Greenwalt, Sarah [greenwalt.sarah@epa.gov]  
**CC:** Woods, Clint [woods.clint@epa.gov]; Gunasekara, Mandy [Gunasekara.Mandy@epa.gov]; Bodine, Susan [bodine.susan@epa.gov]  
**Subject:** RE: Issues I want to learn more about

No worries; the title of the audit program includes "Clean Air Act" and Clint was at the O&G round table in Denver, so it's perfectly understandable that you'd reach out to OAR!

**Patrick Traylor**

Deputy Assistant Administrator  
Office of Enforcement and Compliance Assurance  
U.S. Environmental Protection Agency  
(202) 564-5238 (office)  
Ex. 6 (cell)

---

**From:** Greenwalt, Sarah  
**Sent:** Thursday, May 17, 2018 2:48 PM  
**To:** Traylor, Patrick <traylor.patrick@epa.gov>  
**Cc:** Woods, Clint <woods.clint@epa.gov>; Gunasekara, Mandy <Gunasekara.Mandy@epa.gov>; Bodine, Susan <bodine.susan@epa.gov>  
**Subject:** RE: Issues I want to learn more about

Great, thanks for clearing up my confusion.

**Sarah A. Greenwalt**

U.S. Environmental Protection Agency  
Work: 202-564-1722 | Cell: Ex. 6  
[Greenwalt.Sarah@epa.gov](mailto:Greenwalt.Sarah@epa.gov)

---

**From:** Traylor, Patrick  
**Sent:** Thursday, May 17, 2018 2:47 PM  
**To:** Greenwalt, Sarah <[greenwalt.sarah@epa.gov](mailto:greenwalt.sarah@epa.gov)>  
**Cc:** Woods, Clint <[woods.clint@epa.gov](mailto:woods.clint@epa.gov)>; Gunasekara, Mandy <[Gunasekara.Mandy@epa.gov](mailto:Gunasekara.Mandy@epa.gov)>; Bodine, Susan <[bodine.susan@epa.gov](mailto:bodine.susan@epa.gov)>  
**Subject:** RE: Issues I want to learn more about

Thanks, Sarah. We'll reach out to AJ on these issues, which are both OECA initiatives.

**Patrick Traylor**

Deputy Assistant Administrator  
Office of Enforcement and Compliance Assurance  
U.S. Environmental Protection Agency  
(202) 564-5238 (office)  
Ex. 6 (cell)

---

**From:** Greenwalt, Sarah  
**Sent:** Thursday, May 17, 2018 2:33 PM  
**To:** A.J. Ferate <[aj@feratepllc.com](mailto:aj@feratepllc.com)>

**Cc:** Woods, Clint <[woods.clint@epa.gov](mailto:woods.clint@epa.gov)>; Gunasekara, Mandy <[Gunasekara.Mandy@epa.gov](mailto:Gunasekara.Mandy@epa.gov)>; Bodine, Susan <[bodine.susan@epa.gov](mailto:bodine.susan@epa.gov)>; Traylor, Patrick <[traylor.patrick@epa.gov](mailto:traylor.patrick@epa.gov)>

**Subject:** RE: Issues I want to learn more about

Good to hear from you, A.J. I've cc'ed Mandy and Clint from the Office of Air and Radiation who should be able to connect you with the right folks regarding the proposed New Owner Clean Air Audit Program.

I've also cc'ed Susan and Patrick from the Office of Enforcement and Compliance Assurance who should be able to connect you with the right folks regarding the proposal for an Energy Extraction Compliance Assistance Center.

Best,

**Sarah A. Greenwalt**

U.S. Environmental Protection Agency

Work: 202-564-1722 | Cell: **Ex. 6**

[Greenwalt.Sarah@epa.gov](mailto:Greenwalt.Sarah@epa.gov)

---

**From:** A.J. Ferate [<mailto:aj@feratepllc.com>]

**Sent:** Thursday, May 17, 2018 11:00 AM

**To:** Greenwalt, Sarah <[greenwalt.sarah@epa.gov](mailto:greenwalt.sarah@epa.gov)>

**Subject:** Issues I want to learn more about

I hope all is well, Sarah. When I come out next week I'd be interested in meeting with someone whom might have information on:

- a) the proposed New Owner Clean Air Audit Program, and;
- b) the proposal for an Energy Extraction Compliance Assistance Center

I'm putting together my schedule right now, but other than the Judiciary Committee hearing I'm generally open Tuesday afternoon through 11am Thursday.

Thank you in advance! AJF

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Anthony J. "A.J." Ferate, JD

**Ex. 6** (cell)

Message

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**From:** Greenwalt, Sarah [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=6C13775B8F424E90802669B87B135024-GREENWALT,]  
**Sent:** 5/18/2018 5:42:45 PM  
**To:** Traylor, Patrick [traylor.patrick@epa.gov]  
**Subject:** RE: Issues I want to learn more about

Much appreciated, thank you Patrick. Have a great weekend.

**Sarah A. Greenwalt**

U.S. Environmental Protection Agency

Work: 202-564-1722 | Cell: **Ex. 6**

Greenwalt.Sarah@epa.gov

---

**From:** Traylor, Patrick  
**Sent:** Friday, May 18, 2018 12:33 PM  
**To:** Greenwalt, Sarah <greenwalt.sarah@epa.gov>  
**Cc:** Bodine, Susan <bodine.susan@epa.gov>  
**Subject:** FW: Issues I want to learn more about

Sarah, closing the loop with you on the incoming from A.J.

**Patrick Traylor**

Deputy Assistant Administrator

Office of Enforcement and Compliance Assurance

U.S. Environmental Protection Agency

(202) 564-5238 (office)

**Ex. 6** cell)

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**From:** Traylor, Patrick  
**Sent:** Friday, May 18, 2018 12:33 PM  
**To:** 'A.J. Ferate' <aj@feratepllc.com>  
**Subject:** RE: Issues I want to learn more about

A.J.:

As you can imagine, there is a great deal of interest in our proposed New Owner Clean Air Act Audit Program. We are scheduling a meeting with interested state and industry stakeholders on June 6, 2018, in D.C. to talk about the proposal. I have asked my staff to add your name to the invitation list so that you can join us for the discussion.

The Compliance Assistance Center is still in the early stages of development, so I'll need to get back to you on future opportunities to engage with us.

Warm regards,  
Patrick

**Patrick Traylor**

Deputy Assistant Administrator

Office of Enforcement and Compliance Assurance

U.S. Environmental Protection Agency

(202) 564-5238 (office)

Ex. 6 (cell)

---

**From:** A.J. Ferate [mailto:aj@feratepllc.com]  
**Sent:** Thursday, May 17, 2018 2:59 PM  
**To:** Greenwalt, Sarah <greenwalt.sarah@epa.gov>  
**Cc:** Woods, Clint <woods.clint@epa.gov>; Gunasekara, Mandy <Gunasekara.Mandy@epa.gov>; Bodine, Susan <bodine.susan@epa.gov>; Traylor, Patrick <traylor.patrick@epa.gov>  
**Subject:** Re: Issues I want to learn more about

Thank you so much, Sarah. Any opportunity to learn about the proposals would be helpful. Thanks again! AJF

---

Anthony J. "A.J." Ferate, JD

Ex. 6 (cell)

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**From:** Greenwalt, Sarah <greenwalt.sarah@epa.gov>  
**Sent:** Thursday, May 17, 2018 1:32:30 PM  
**To:** A.J. Ferate  
**Cc:** Woods, Clint; Gunasekara, Mandy; Bodine, Susan; Traylor, Patrick  
**Subject:** RE: Issues I want to learn more about

Good to hear from you, A.J. I've cc'ed Mandy and Clint from the Office of Air and Radiation who should be able to connect you with the right folks regarding the proposed New Owner Clean Air Audit Program.

I've also cc'ed Susan and Patrick from the Office of Enforcement and Compliance Assurance who should be able to connect you with the right folks regarding the proposal for an Energy Extraction Compliance Assistance Center.

Best,

**Sarah A. Greenwalt**

U.S. Environmental Protection Agency

Work: 202-564-1722 | Cell: Ex. 6

[Greenwalt.Sarah@epa.gov](mailto:Greenwalt.Sarah@epa.gov)

---

**From:** A.J. Ferate [mailto:aj@feratepllc.com]  
**Sent:** Thursday, May 17, 2018 11:00 AM  
**To:** Greenwalt, Sarah <greenwalt.sarah@epa.gov>  
**Subject:** Issues I want to learn more about

I hope all is well, Sarah. When I come out next week I'd be interested in meeting with someone whom might have information on:

- a) the proposed New Owner Clean Air Audit Program, and;
- b) the proposal for an Energy Extraction Compliance Assistance Center

I'm putting together my schedule right now, but other than the Judiciary Committee hearing I'm generally open Tuesday afternoon through 11am Thursday.

Thank you in advance! AJF

---

Anthony J. "A.J." Ferate, JD

**Ex. 6** cell)

Message

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**From:** Swack, David [Swack.David@epa.gov]  
**Sent:** 9/19/2018 1:05:34 PM  
**To:** Bodine, Susan [bodine.susan@epa.gov]; Starfield, Lawrence [Starfield.Lawrence@epa.gov]; Traylor, Patrick [traylor.patrick@epa.gov]; Kelley, Rosemarie [Kelley.Rosemarie@epa.gov]; Dombrowski, John [Dombrowski.John@epa.gov]; DeLeon, Rafael [Deleon.Rafael@epa.gov]; Barnet, Henry [Barnet.Henry@epa.gov]; Muller, Marie [MULLER.MARIE@EPA.GOV]; McKeever, Michele [McKeever.Michele@epa.gov]  
**CC:** Warren, JohnM [Warren.JohnM@epa.gov]  
**Subject:** OMB Package - Draft Final  
**Attachments:** FY 2020 OMB Hearing FINAL 9-19-18 am.ppt

Attached is the OMB package with a couple of fixes from yesterday's discussion – (more space on slide 2, new footnote on slide 13, and corrected typos in the date on slides 13-15). Please take a last look and let us know if you see any typos or cosmetic issues. Our plan is to print the sets around 10:30. Thanks,

David


Message

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**From:** Mia, Marcia [Mia.Marcia@epa.gov]  
**Sent:** 9/18/2018 9:21:35 PM  
**To:** Traylor, Patrick [traylor.patrick@epa.gov]  
**Subject:** RE: Oil and Gas Briefing Book for IOGCC

<!--[if lte mso 15 || CheckWebRef]-->

Mia, Marcia has shared a OneDrive for Business file with you. To view it, click the link below.

 Draft - 2018 Sept IOGCC Meeting Briefing Materials.docx

<!--[endif]-->

Hi Patrick,

I have made changes to the document per your suggestions. The updated draft is attached here (note there is still some redline because programs/regions have made edits to their portions.) The OECA section now begins on the bottom of page 24.

## Deliberative Process / Ex. 5

Deliberative Process / Ex. 5

Apple helped with the Audit

section.

Please let me know if you have any edits or further suggestions. Thanks!

Marcia B Mia  
Air Branch  
Office of Compliance  
2227A WJCS  
U.S. Environmental Protection Agency  
202-564-7042

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**From:** Traylor, Patrick  
**Sent:** Thursday, September 06, 2018 5:36 PM  
**To:** Mia, Marcia <Mia.Marcia@epa.gov>  
**Subject:** RE: Oil and Gas Briefing Book for IOGCC

It's final now. ECOS has an unusual convention of labeling its documents as Draft x.0 (presumably to keep future revisions straight). But the document I sent is the final work product, and is a public document.

**Patrick Traylor**  
Deputy Assistant Administrator  
Office of Enforcement and Compliance Assurance  
U.S. Environmental Protection Agency  
(202) 564-5238 (office)

**Ex. 6**

(cell)

---

**From:** Mia, Marcia  
**Sent:** Thursday, September 6, 2018 4:39 PM  
**To:** Traylor, Patrick <traylor.patrick@epa.gov>  
**Subject:** RE: Oil and Gas Briefing Book for IOGCC

Thank you Patrick. Do you know when the draft ECOS report will be finalized?

**Deliberative Process / Ex. 5**

**Deliberative Process / Ex. 5**

Do you want to see the changes before I send them over to Jim Kenney? If so, do you want the RLSO document or excerpts in an email? Let me know which is easiest for you. Thanks.

Marcia B Mia  
Air Branch  
Office of Compliance  
2227A WJCS  
U.S. Environmental Protection Agency  
202-564-7042

*This message may contain deliberative, attorney-client or otherwise privileged material. Do not release this message without the appropriate review. If you are not the intended recipient, kindly advise and delete this message/attachments.*

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**From:** Traylor, Patrick  
**Sent:** Wednesday, September 05, 2018 5:04 PM  
**To:** Mia, Marcia <Mia.Marcia@epa.gov>  
**Subject:** RE: Oil and Gas Briefing Book for IOGCC

Marcia:

Thanks for reaching out. I do have a couple of thoughts.

# Deliberative Process / Ex. 5

Patrick

**Patrick Traylor**  
Deputy Assistant Administrator  
Office of Enforcement and Compliance Assurance  
U.S. Environmental Protection Agency  
(202) 564-5238 (office)  
**Ex. 6** (cell)

---

**From:** Mia, Marcia  
**Sent:** Thursday, August 30, 2018 3:41 PM  
**To:** Traylor, Patrick <traylor.patrick@epa.gov>  
**Subject:** Oil and Gas Briefing Book for IOGCC



Hi Patrick,

I am reaching out to you in my role as the UOG POC.

**Deliberative Process / Ex. 5**

**Deliberative Process / Ex. 5**

Are there additional topic areas for OECA that you would like to see highlighted or discussed? Thanks, in advance.

Marcia B Mia  
Unconventional Oil and Gas Point of Contact (UOG POC)  
Office of Enforcement and Compliance Assurance  
U.S. Environmental Protection Agency  
202-564-7042

*This message may contain deliberative, attorney-client or otherwise privileged material. Do not release this message without the appropriate review. If you are not the intended recipient, kindly advise and delete this message/attachments.*

Message

---

**From:** Shiffman, Cari [Shiffman.Cari@epa.gov]  
**Sent:** 9/18/2018 2:49:24 PM  
**To:** Traylor, Patrick [traylor.patrick@epa.gov]  
**Subject:** FW: OD Meeting Materials for Tuesday, September 18, 2018  
**Attachments:** FY 2020 OMB Hearing Draft 9-18-18 AA DAA edits.ppt

---

**From:** Shiffman, Cari  
**Sent:** Tuesday, September 18, 2018 10:48 AM  
**To:** OECA Office Directors and Deputy Directors <OECA\_Office\_Directors\_and\_Deputy\_Directors@epa.gov>  
**Cc:** Branning, Hannah <Branning.Hannah@epa.gov>; McKeever, Michele <McKeever.Michele@epa.gov>; Johnson, Catherine M. <johnson.catherinem@epa.gov>; Forster, Rosa <Forster.Rosa@epa.gov>; Kadish, Rochele <Kadish.Rochele@epa.gov>; Braham, Maurice <Braham.Maurice@epa.gov>; Bailey, Ethel <Bailey.Ethel@epa.gov>; Loving, Shanita <Loving.Shanita@epa.gov>; Thompson, Patricia <thompson.patricia@epa.gov>; Lucas, Catherine <Lucas.Catherine@epa.gov>; Washington, Barbara <Washington.Barbara@epa.gov>; Swack, David <Swack.David@epa.gov>  
**Subject:** RE: OD Meeting Materials for Tuesday, September 18, 2018

ODs,

Susan and Larry would like to do some prep for the OMB Hearing for the last 30 minutes of the OD meeting today. Here is the latest slide deck, which includes an edit Larry and John made last night.

Thanks,

Cari Shiffman, Chief of Staff  
U.S. Environmental Protection Agency  
Office of Enforcement and Compliance Assurance  
Office: (202) 564-2898 | Mobile: Ex. 6

---

**From:** Shiffman, Cari  
**Sent:** Monday, September 17, 2018 5:05 PM  
**To:** Bodine, Susan <bodine.susan@epa.gov>; Starfield, Lawrence <Starfield.Lawrence@epa.gov>; Traylor, Patrick <traylor.patrick@epa.gov>; OECA Office Directors and Deputy Directors <OECA\_Office\_Directors\_and\_Deputy\_Directors@epa.gov>; Branning, Hannah <Branning.Hannah@epa.gov>; Cozad, David <Cozad.David@epa.gov>; Skelley, Dana <Skelley.Dana@epa.gov>; Gargas, Toni <Gargas.Toni@epa.gov>; LaBoda, Sarah <LaBoda.Sarah@epa.gov>; Sullivan, Greg <Sullivan.Greg@epa.gov>; Anderson, Kate <Anderson.Kate@epa.gov>  
**Cc:** Palmer, Daniel <Palmer.Daniel@epa.gov>; McKeever, Michele <McKeever.Michele@epa.gov>; Johnson, Catherine M. <johnson.catherinem@epa.gov>; Forster, Rosa <Forster.Rosa@epa.gov>; Kadish, Rochele <Kadish.Rochele@epa.gov>; Braham, Maurice <Braham.Maurice@epa.gov>; Bailey, Ethel <Bailey.Ethel@epa.gov>; Loving, Shanita <Loving.Shanita@epa.gov>; Thompson, Patricia <thompson.patricia@epa.gov>; Lucas, Catherine <Lucas.Catherine@epa.gov>; Washington, Barbara <Washington.Barbara@epa.gov>  
**Subject:** OD Meeting Materials for Tuesday, September 18, 2018

Reminder – tomorrow will be our monthly business review meeting (bowling chart).

Thanks,

Cari Shiffman, Chief of Staff  
U.S. Environmental Protection Agency  
Office of Enforcement and Compliance Assurance  
Office: (202) 564-2898 | Mobile:

**Ex. 6**

Message

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**From:** Chapman, Apple [Chapman.Apple@epa.gov]  
**Sent:** 9/5/2018 8:14:52 PM  
**To:** Traylor, Patrick [traylor.patrick@epa.gov]  
**CC:** Mia, Marcia [Mia.Marcia@epa.gov]  
**Subject:** IOGCC internal briefing book

Patrick,

Marcia is updating the briefing book for the IOGCC meeting. If you have any topics that you want included please let her know. I already sent her a blurb on the proposed oil and natural gas new owner audit program. Thanks.

*Ms. Apple Chapman* | Deputy Director, Air Enforcement Division | U.S. Environmental Protection Agency  
1200 Pennsylvania Ave. NW, Washington DC, 20004 | 202-564-5666 (office) | Ex. 6 (mobile) |

Message

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**From:** Miller, Anthony [Miller.Anthony@epa.gov]  
**Sent:** 9/4/2018 10:15:06 PM  
**To:** Chapman, Apple [Chapman.Apple@epa.gov]; Traylor, Patrick [traylor.patrick@epa.gov]  
**CC:** Kelley, Rosemarie [Kelley.Rosemarie@epa.gov]; Sullivan, Tim [Sullivan.Tim@epa.gov]; Sullivan, Greg [Sullivan.Greg@epa.gov]; Loving, Shanita [Loving.Shanita@epa.gov]; Belser, Evan [Belser.Evan@epa.gov]; Brooks, Phillip [Brooks.Phillip@epa.gov]; Fried, Gregory [Fried.Gregory@epa.gov]; Stahle, Susan [Stahle.Susan@epa.gov]  
**Subject:** RE: Agenda and materials for tomorrow AED weekly  
**Attachments:** **Enforcement/Investigatory / Ex. 7(a)**

Patrick,

**Enforcement/Investigatory / Ex. 7(a) and Deliberative Process / Ex. 5**

Thank you,  
-Tony

Tony Miller  
Chief/Chemical Engineer, P.E.  
OECA/AED/Fuels Enforcement Branch (8MSU)  
1595 Wynkoop Street, Rm 2222  
Denver, Colorado 80202

Tel: 303-312-7161  
Fax: 303-312-6003

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---

**From:** Chapman, Apple  
**Sent:** Tuesday, September 4, 2018 2:36 PM  
**To:** Traylor, Patrick <traylor.patrick@epa.gov>  
**Cc:** Kelley, Rosemarie <Kelley.Rosemarie@epa.gov>; Sullivan, Tim <Sullivan.Tim@epa.gov>; Sullivan, Greg <Sullivan.Greg@epa.gov>; Loving, Shanita <Loving.Shanita@epa.gov>; Belser, Evan <Belser.Evan@epa.gov>; Brooks, Phillip <Brooks.Phillip@epa.gov>; Fried, Gregory <Fried.Gregory@epa.gov>; Miller, Anthony <Miller.Anthony@epa.gov>; Stahle, Susan <Stahle.Susan@epa.gov>  
**Subject:** Agenda and materials for tomorrow AED weekly

Patrick

Attached are the materials and agenda for our meeting tomorrow. Welcome back. Hope you had a great vacation!

**Enforcement/Investigatory / Ex. 7(a) and Deliberative Process / Ex. 5**

**Enforcement/Investigatory / Ex. 7(a) and Deliberative Process / Ex. 5**

*Ms. Apple Chapman* | Deputy Director, Air Enforcement Division | U.S. Environmental Protection Agency  
1200 Pennsylvania Ave. NW, Washington DC, 20004 | 202-564-5666 (office) | Ex. 6 mobile) |

Message

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**From:** Leff, Karin [Leff.Karin@epa.gov]  
**Sent:** 9/14/2018 5:10:09 PM  
**To:** Bodine, Susan [bodine.susan@epa.gov]; Starfield, Lawrence [Starfield.Lawrence@epa.gov]; Swack, David [Swack.David@epa.gov]; Traylor, Patrick [traylor.patrick@epa.gov]; Kelley, Rosemarie [Kelley.Rosemarie@epa.gov]; Fogarty, Johnpc [Fogarty.Johnpc@epa.gov]; Porter, Amy [Porter.Amy@epa.gov]; Dombrowski, John [Dombrowski.John@epa.gov]; McKeever, Michele [McKeever.Michele@epa.gov]; Barnet, Henry [Barnet.Henry@epa.gov]; Mazakas, Pam [Mazakas.Pam@epa.gov]; Muller, Marie [MULLER.MARIE@EPA.GOV]; Mackey, Cyndy [Mackey.Cyndy@epa.gov]; DeLeon, Rafael [DeLeon.Rafael@epa.gov]; Badalamente, Mark [Badalamente.Mark@epa.gov]  
**CC:** Warren, JohnM [Warren.JohnM@epa.gov]; Strickland, Francine [Strickland.Francine@epa.gov]; James, Christina [james.christina@epa.gov]; McCray, Deborah [McCray.Deborah@epa.gov]; Toy, Nancy [Toy.Nancy@epa.gov]; Alston, Wanda [Alston.Wanda@epa.gov]; Pointer, Shereta [Pointer.Shereta@epa.gov]  
**Subject:** RE: Draft OMB Presentation  
**Attachments:** FY 2020 OMB Hearing First Draft 9-14-18.ppt

I made edits to slides 4 and 8 (in redline).

---

Karin Leff  
Director, Federal Facilities Enforcement Office  
US EPA-OECA  
202.564.7068 (w)

Ex. 6 (c)

This message is CONFIDENTIAL and may contain legally privileged information. If you are not the intended recipient, or believe you received this communication in error, please delete it immediately, do not copy, and notify the sender. Thank you.

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**From:** Bodine, Susan  
**Sent:** Friday, September 14, 2018 10:36 AM  
**To:** Starfield, Lawrence <Starfield.Lawrence@epa.gov>; Swack, David <Swack.David@epa.gov>; Traylor, Patrick <traylor.patrick@epa.gov>; Kelley, Rosemarie <Kelley.Rosemarie@epa.gov>; Fogarty, Johnpc <Fogarty.Johnpc@epa.gov>; Porter, Amy <Porter.Amy@epa.gov>; Dombrowski, John <Dombrowski.John@epa.gov>; McKeever, Michele <McKeever.Michele@epa.gov>; Barnet, Henry <Barnet.Henry@epa.gov>; Mazakas, Pam <Mazakas.Pam@epa.gov>; Leff, Karin <Leff.Karin@epa.gov>; Muller, Marie <MULLER.MARIE@EPA.GOV>; Mackey, Cyndy <Mackey.Cyndy@epa.gov>; DeLeon, Rafael <DeLeon.Rafael@epa.gov>; Badalamente, Mark <Badalamente.Mark@epa.gov>  
**Cc:** Warren, JohnM <Warren.JohnM@epa.gov>; Strickland, Francine <Strickland.Francine@epa.gov>; James, Christina <james.christina@epa.gov>; McCray, Deborah <McCray.Deborah@epa.gov>; Toy, Nancy <Toy.Nancy@epa.gov>; Alston, Wanda <Alston.Wanda@epa.gov>; Pointer, Shereta <Pointer.Shereta@epa.gov>  
**Subject:** RE: Draft OMB Presentation

I made a few edits also to slides 3, 4, 5, and 7

---

**From:** Starfield, Lawrence

**Sent:** Thursday, September 13, 2018 10:48 PM

**To:** Swack, David <Swack.David@epa.gov>; Bodine, Susan <bodine.susan@epa.gov>; Traylor, Patrick <traylor.patrick@epa.gov>; Kelley, Rosemarie <Kelley.Rosemarie@epa.gov>; Fogarty, Johnpc <Fogarty.Johnpc@epa.gov>; Porter, Amy <Porter.Amy@epa.gov>; Dombrowski, John <Dombrowski.John@epa.gov>; McKeever, Michele <McKeever.Michele@epa.gov>; Barnet, Henry <Barnet.Henry@epa.gov>; Mazakas, Pam <Mazakas.Pam@epa.gov>; Leff, Karin <Leff.Karin@epa.gov>; Muller, Marie <MULLER.MARIE@EPA.GOV>; Mackey, Cyndy <Mackey.Cyndy@epa.gov>; DeLeon, Rafael <Deleon.Rafael@epa.gov>; Badalamente, Mark <Badalamente.Mark@epa.gov>  
**Cc:** Warren, JohnM <Warren.JohnM@epa.gov>; Strickland, Francine <Strickland.Francine@epa.gov>; James, Christina <james.christina@epa.gov>; McCray, Deborah <McCray.Deborah@epa.gov>; Toy, Nancy <Toy.Nancy@epa.gov>; Alston, Wanda <Alston.Wanda@epa.gov>; Pointer, Shereta <Pointer.Shereta@epa.gov>  
**Subject:** RE: Draft OMB Presentation

David,

Thanks for assembling the draft slide deck for OMB. I won't be in the office tomorrow, so I thought I'd send you a mark-up tonight (see attached).

A few points:

# Deliberative Process / Ex. 5

Larry

This message is CONFIDENTIAL, and may contain legally privileged information. If you are not the intended recipient, or believe you received this communication in error, please delete it immediately, do not copy, and notify the sender. Thank you.

---

**From:** Swack, David

**Sent:** Thursday, September 13, 2018 5:51 PM

**To:** Bodine, Susan <bodine.susan@epa.gov>; Starfield, Lawrence <Starfield.Lawrence@epa.gov>; Traylor, Patrick <traylor.patrick@epa.gov>; Kelley, Rosemarie <Kelley.Rosemarie@epa.gov>; Fogarty, Johnpc <Fogarty.Johnpc@epa.gov>; Porter, Amy <Porter.Amy@epa.gov>; Dombrowski, John <Dombrowski.John@epa.gov>; McKeever, Michele <McKeever.Michele@epa.gov>; Barnet, Henry <Barnet.Henry@epa.gov>; Mazakas, Pam <Mazakas.Pam@epa.gov>; Leff, Karin <Leff.Karin@epa.gov>; Muller, Marie <MULLER.MARIE@EPA.GOV>; Mackey, Cyndy <Mackey.Cyndy@epa.gov>; DeLeon, Rafael <Deleon.Rafael@epa.gov>; Badalamente, Mark



<Badalamente.Mark@epa.gov>

**Cc:** Warren, JohnM <Warren.JohnM@epa.gov>; Strickland, Francine <Strickland.Francine@epa.gov>; James, Christina <james.christina@epa.gov>; McCray, Deborah <McCray.Deborah@epa.gov>; Toy, Nancy <Toy.Nancy@epa.gov>; Alston, Wanda <Alston.Wanda@epa.gov>; Pointer, Shereta <Pointer.Shereta@epa.gov>

**Subject:** Draft OMB Presentation

All,

Attached is a first cut at our OMB hearing slides. A few points I would offer:

# Deliberative Process / Ex. 5

Thanks for your review. If we could get everyone's thoughts by COB tomorrow (Friday), we can have a new version around on Monday. Thanks in advance for your thoughts.

David

Message

---

**From:** Chapman, Apple [Chapman.Apple@epa.gov]  
**Sent:** 9/4/2018 8:35:41 PM  
**To:** Traylor, Patrick [traylor.patrick@epa.gov]  
**CC:** Kelley, Rosemarie [Kelley.Rosemarie@epa.gov]; Sullivan, Tim [Sullivan.Tim@epa.gov]; Sullivan, Greg [Sullivan.Greg@epa.gov]; Loving, Shanita [Loving.Shanita@epa.gov]; Belser, Evan [Belser.Evan@epa.gov]; Brooks, Phillip [Brooks.Phillip@epa.gov]; Fried, Gregory [Fried.Gregory@epa.gov]; Miller, Anthony [Miller.Anthony@epa.gov]; Stahle, Susan [Stahle.Susan@epa.gov]  
**Subject:** Agenda and materials for tomorrow AED weekly

**Attachments:**

**Enforcement/Investigatory / Ex. 7(a) and Deliberative Process / Ex. 5**

Patrick

Attached are the materials and agenda for our meeting tomorrow. Welcome back. Hope you had a great vacation!

**Enforcement/Investigatory / Ex. 7(a) and Deliberative Process / Ex. 5**

*Ms. Apple Chapman* | Deputy Director, Air Enforcement Division | U.S. Environmental Protection Agency  
1200 Pennsylvania Ave. NW, Washington DC, 20004 | 202-564-5666 (office) **Ex. 6** (mobile)

Message

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**From:** Woods, Clint [woods.clint@epa.gov]  
**Sent:** 6/22/2018 12:51:16 AM  
**To:** Kenney, James [Kenney.James@epa.gov]; Traylor, Patrick [traylor.patrick@epa.gov]  
**CC:** Dominguez, Alexander [dominguez.alexander@epa.gov]  
**Subject:** Fwd: State/Tribal/EPA June Conference Call Summary  
**Attachments:** 2018-06-20 Conference Call Summary.docx; ATT00001.htm

Jim and Patrick,

OAR leadership should be participating on these calls - Please include myself and Alex Dominguez in the future.

Thanks!

Clint

Begin forwarded message:

**From:** "Kenney, James" <Kenney.James@epa.gov>  
**Date:** June 21, 2018 at 7:48:58 PM EDT  
**To:** "Kenney, James" <Kenney.James@epa.gov>  
**Subject:** State/Tribal/EPA June Conference Call Summary

Hello and thank you for your interest and/or participation in the oil and natural gas conference calls between states, tribes and EPA. Attached please find a summary of the call that took place yesterday and list of registered or confirmed attendees. I highlighted important information and action items in yellow to quickly draw your attention to key dates. Please share this summary with members of your organization who may be interested.

Our next call is scheduled for Wednesday, August 15 at 1 pm EDT. I will provide you with an agenda and conference call logistics in mid-July.

Please do not hesitate to contact me if you have any questions or suggestions.

Thank you –

Jim

--

James C. Kenney | Senior Policy Advisor for Unconventional Oil and Gas | US EPA

**Desk/Mobile:** Ex. 6 **Email:** [kenney.james@epa.gov](mailto:kenney.james@epa.gov)

---

***Please note:** I am geographically located in Albuquerque, New Mexico (Mountain Time Zone).  
This message may contain deliberative, attorney-client or otherwise privileged material. Do not release this message without the appropriate review. If you are not the intended recipient, kindly advise and delete this message/attachments. Namaste.*

## State/Tribal/EPA Oil and Natural Gas Conference Call Summary

Prepared by Jim Kenney on June 21, 2018

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**Date:** Wednesday, June 20, 2018

**Time:** 1-2 pm EDT

**Attendees:** See attached list.

### Conference Call Summary:

Patrick Traylor, Deputy Assistant Administrator for the Office of Enforcement and Compliance Assurance (OECA) began the discussions by explaining why EPA was embarking on Agency-wide calls with states and tribes and his role.

Patrick explained that earlier this year, the EPA held an oil and natural gas stakeholder roundtable in Denver, Colorado. EPA's roundtable was cosponsored by the Environmental Council of State (ECOS) and the Interstate Oil and Gas Compact Commission (IOGCC). A summary of the oil and natural gas roundtable is available on EPA's website. The roundtable focused on the following objectives:

1. Improving relationships and enhancing communications among stakeholders and
2. Identifying and sharing solutions related to challenges that adversely impact efficient and timely compliance.

A central theme expressed by state and tribal representatives at the roundtable and subsequent to it centered on the concept of meaningful collaboration and engagement. Specifically, states and tribes expressed a desire to further cooperation, irrespective of delegation or primacy.

Patrick explained that the EPA has a longstanding tradition of internally coordinating and discussing oil and natural gas matters. In contemplating ways to more meaningfully collaborate and engage with states and tribes, the EPA is embarking on bi-monthly conference calls with states and tribes. These calls will serve as more regular touch point for states, tribes and the EPA to engage on oil and natural gas matters of interest. Further, Patrick explained that he was charged by the Administrator's Office to lead this effort corporately – across EPA's program and regional offices – collaterally to his duties as the OECA Deputy Assistant Administrator.

Patrick then introduced Jim Kenney, Senior Policy Advisor for Unconventional Oil and Natural Gas. Jim is a career EPA employee who coordinates the various oil and natural gas matters internally across the Agency, reporting to the Administrator's Office. Jim is an environmental engineer who has focused exclusively on oil and natural gas regulatory and policy matters over the past eight years (but has been with the Agency for just over 20 years). Patrick explained that Jim will lead the state and tribal conference calls and work closely with senior leadership as necessary.

After providing some introductory remarks, Jim briefly highlighted the following EPA activities that may be of interest to states and tribes:

1. Clean Water Act/Produced Water Study – EPA is embarking on a new study that will take a holistic look at how the Agency, states and stakeholders regulate and manage produced water, focusing on whether treatment and surface water discharge should be an option.

## State/Tribal/EPA Oil and Natural Gas Conference Call Summary

Prepared by Jim Kenney on June 21, 2018

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2. Safe Drinking Water Act/Development of a UIC Comprehensive Program Evaluation Document – EPA is developing a draft document to better ensure national consistency and transparency to the existing comprehensive program evaluations under the UIC program.
3. Safe Drinking Water Act/Development of a UIC Program Revision/Primacy Webpage – The purpose of this webpage is to provide states and tribes with general information on the process of obtaining primacy or a program revision. The webpage will also provide example documents for states, tribes and EPA Regions to use when seeking primacy or a program revision.
4. Safe Drinking Water Act/Improving the timeliness of Class II permitting decisions – EPA is “Leaning” the process to improve timeliness and working to bring Class II permitting decisions to a six month or less process.
5. Clean Air Act Compliance/New Owner Audit Policy for Oil and Natural Gas Operators – EPA is accepting comments on the draft standard audit agreement until Thursday, July 5, 2018. In addition, we are offering stakeholder meetings next week by conference call or in person in Washington, DC. To participate, please register with Apple Chapman via email at [Chapman.Apple@epa.gov](mailto:Chapman.Apple@epa.gov).
  - The meeting for tribal stakeholders is scheduled for Wednesday, June 27 from 1:30 – 4:00 pm EDT.
  - The meeting for state stakeholders is scheduled for Thursday, June 28 from 1:30 – 4:00 pm EDT.
6. Compliance Assistance/Developing an Oil and Natural Gas Compliance Assistance Center – A web-based, “one stop shop” for federal and state requirements for oil/gas operators and their contractors. State and tribal input is welcome and needed in assisting EPA and its contractor in standing this up by the end of 2018.

Jim asked state and tribal participants to share their organization’s thoughts about topics for future conference calls by either focusing on the list above or proposing additional topics of interest. The following list of topics were identified by individual participants:

1. EPA’s New Owner Audit Policy for Oil and Natural Gas Operators.
2. The State of Play: A National Overview of Unconventional Oil and Natural Gas Activity.
3. Clean Air Act Aggregation Related to Oil and Natural Gas Operations
4. Clean Air Act NSPS OOOOa – Past, Present and Future
5. EPA’s Produced Water Study

### Action Item(s):

1. Please give some thought to other topics of interest and send Jim Kenney suggestions by close of business Monday, July 9, 2018. Jim will put together a conference call schedule and work to

## State/Tribal/EPA Oil and Natural Gas Conference Call Summary

Prepared by Jim Kenney on June 21, 2018

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identify/secure the necessary speakers.

2. The next bi-monthly state/tribe/EPA oil and natural gas conference call will take place on Wednesday, August 15, 2018 from 1-2 pm EDT. An agenda and conference call logistics will be sent in mid-July.

## State/Tribal/EPA Oil and Natural Gas Conference Call Summary

Prepared by Jim Kenney on June 21, 2018

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### Registered/Confirmed Attendees:

Name	Affiliation
Jesse Adkins	West Virginia Department of Environmental Protection
David Albright	U.S. EPA/Region 9
Andrew Baca	U.S. EPA/Office of International and Tribal Affairs
Gerry Baker	Interstate Oil and Gas Compact Commission
Kim Bannerman	New Mexico Environmental Department
Bill Bartling	California Department of Conservation
Bill Bates	U.S. EPA/Office of Water
John Baza	Utah Division of Oil, Gas and Mining
Cindy Beeler	U.S. EPA/Region 8
Stan Belieu	Nebraska Oil and Gas Conservation Commission
Andrew Byrne	U.S. EPA/Office of International and Tribal Affairs
Ryan Channell	North Carolina Geological Survey, Department of Environmental Quality
Apple Chapman	U.S. EPA/Office of Enforcement and Compliance Assurance
Chris Colclasure	Colorado Department of Public Health and the Environment
Jennifer Curtis	U.S. EPA/Region 10
William Durham	West Virginia Department of Environmental Protection
Phil Egidi	U.S. EPA/Office of Air and Radiation
Adam Eisele	U.S. EPA/Office of Air and Radiation
Ross Elliott	U.S. EPA/Office of Land and Emergency Management
Hal Fitch	Michigan Department of Environmental Quality
Mark Fite	U.S. EPA/Region 4
Joe Francis	Nebraska Department of Environmental Quality
Ralph Gruebel	New Mexico Environment Department
Karen Gude	U.S. EPA/Office of Water
Amy Hambrick	U.S. EPA/Office of Air and Radiation
Andrew Hanson	U.S. EPA/Administrator's Office/Office of Congressional and Intergovernmental Relations
Kristen Hendricks	South Dakota Department of Environmental & Natural Resources
Kurt Hildebrandt	U.S. EPA/Region 10
Bob Hodanbosi	Ohio Environmental Protection Agency
Michelle Hunter	New Mexico Environment Department
Mark Jones	New Mexico Environment Department
Tiffani Kavalec	Ohio Environmental Protection Agency
Jim Kenney	U.S. EPA/Administrator's Office/Office of Congressional and Intergovernmental Relations
Andrew Keyfauver	Wyoming Department of Environmental Quality
Bruce Kobelski	U.S. EPA/Office of Water
Kent Kuster	Colorado Department of Public Health and Environment
Rob Lawrence	U.S. EPA/Region 6
William Lynn	Osage Nation
James Martin	West Virginia Department of Environmental Protection
Marcia Mia	U.S. EPA/Office of Enforcement and Compliance Assurance
Ken Mitchell	U.S. EPA/Region 4

## State/Tribal/EPA Oil and Natural Gas Conference Call Summary

Prepared by Jim Kenney on June 21, 2018

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Tom	Moore	Western States Air Resources Council (WESTAR)
Monica	Morales	U.S. EPA/Region 8
Sage	Mountainflower	Pueblo of Sandia
Julie	Murphy	Oil and Gas Conservation Commission
Mike	Paque	Ground Water Protection Council
Pooja	Parikh	U.S. EPA/Office of General Counsel
Lia	Parisien	Environmental Council of the States
Scott	Patefield	U.S. EPA/Region 8
Scott	Perry	Pennsylvania Department of Environmental Protection
Larry	Pierce	Missouri Department of Natural Resources
Jenny	Potter	Utah Department of Environmental Quality
Alexi	Remnek	U.S. EPA/Region 2
Keith	Sheedy	Texas Commission on Environmental Quality
Mike	Smith	Interstate Oil and Gas Compact Commission
Rene	Stucky	Kansas Corporation Commission
Rachel	Tadlock	California Department of Conservation
Larry	Taylor	Kentucky Department of Environmental Protection
Kenneth	Taylor	North Carolina Department of Environmental Quality
Patrick	Traylor	U.S. EPA/Office of Enforcement and Compliance Assurance
Allyson	Two Bears	Standing Rock Reservation, Standing Rock Sioux Tribe
Nancy	Vehr	Wyoming DEQ Air Quality Division
Chris	Vierrether	Missouri Department of Natural Resources
Mark	Watson	Wyoming Oil and Gas Conservation Commission
Jim	Werntz	U.S. EPA/Region 10



Message

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**From:** Brooks, Phillip [Brooks.Phillip@epa.gov]  
**Sent:** 7/25/2018 9:37:47 PM  
**To:** Traylor, Patrick [traylor.patrick@epa.gov]; Kelley, Rosemarie [Kelley.Rosemarie@epa.gov]  
**Subject:** Fwd: State Requirements for ONG  
**Attachments:** ong new owner audit sip and permit summary\_rev 3.docx; ATT00001.htm; Copy of Sample Table for OG Permitting Req rev 1.xlsx; ATT00002.htm

Patrick

# Deliberative Process / Ex. 5

Sent from my iPhone

Begin forwarded message:

**From:** "Hoyt, Daniel" <Hoyt.Daniel@epa.gov>  
**Date:** July 25, 2018 at 5:21:09 PM EDT  
**To:** "Brooks, Phillip" <Brooks.Phillip@epa.gov>  
**Cc:** "Chapman, Apple" <Chapman.Apple@epa.gov>, "Fried, Gregory" <Fried.Gregory@epa.gov>, "Williams, Christopher" <Williams.Christopher@epa.gov>, "Sullivan, Tim" <Sullivan.Tim@epa.gov>  
**Subject:** State Requirements for ONG

Phill,

# Deliberative Process / Ex. 5

Please let me know if you have any feedback regarding changes you would like to see, or if you have any questions.

Regards,

Dan

Daniel Hoyt, Environmental Engineer  
US Environmental Protection Agency  
Office of Enforcement and Compliance Assurance  
Office of Civil Enforcement - Air Enforcement Division  
(202) 564-7898  
1200 Pennsylvania Ave, NW  
WJC-S, MC 2242A  
Washington, DC 20460 (mail) or 20004 (courier)

Message

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**From:** Traylor, Patrick [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=B6D06C6B766C4B4B8BFD6B0FEA4B998-TRAYLOR, PA]  
**Sent:** 7/31/2018 5:25:28 PM  
**To:** Thompson, Steve [thompson.steve@epa.gov]  
**CC:** Fried, Gregory [Fried.Gregory@epa.gov]  
**Subject:** Re: Draft O&G Design Audit Checklist

Thanks, Steve.

**Patrick Traylor**  
Deputy Assistant Administrator  
Office of Enforcement and Compliance Assurance  
U.S. Environmental Protection Agency  
(202) 564-5238 (office)  
**Ex. 6** (cell)

On Jul 31, 2018, at 1:20 PM, Thompson, Steve <thompson.steve@epa.gov> wrote:

See below

Sent from my iPhone

Begin forwarded message:

**From:** Ramiro Garcia <ramiro.garcia@tceq.texas.gov>  
**Date:** July 24, 2018 at 3:48:43 PM CDT  
**To:** "Fried, Gregory" <Fried.Gregory@epa.gov>  
**Cc:** "Thompson, Steve" <thompson.steve@epa.gov>, Susan Jablonski <susan.jablonski@tceq.texas.gov>, "Hoyt, Daniel" <Hoyt.Daniel@epa.gov>, "Williams, Christopher" <Williams.Christopher@epa.gov>  
**Subject:** RE: Draft O&G Design Audit Checklist

Hello Greg,

It is good to hear from you. I apologize for my delay in getting back to you, I was on the road last week. I am meeting with the Area Directors this week to discuss the list and the best path forward.

I do not have any updates on Encana and Chesapeake audits at this time. As soon as I have an update I will gladly share it with you and your colleagues.

I hope you are well and I look forward to chatting with you soon.

-Ramiro

---

**From:** Fried, Gregory <Fried.Gregory@epa.gov>  
**Sent:** Tuesday, July 17, 2018 8:40 AM  
**To:** Ramiro Garcia <Ramiro.Garcia@tceq.texas.gov>  
**Cc:** Thompson, Steve <thompson.steve@epa.gov>; Susan Jablonski <Susan.Jablonski@tceq.texas.gov>; Hoyt, Daniel <Hoyt.Daniel@epa.gov>; Williams,

Christopher <[Williams.Christopher@epa.gov](mailto:Williams.Christopher@epa.gov)>

**Subject:** FW: Draft O&G Design Audit Checklist

Good Morning Ramiro,

Hope all is well. Just checking in on the status of the Encana and Chesapeake audits, particularly with regard to the company's evaluation of their design. Let me know if you have any questions about the attached checklist that Patrick sent along last month (see attached). I can set-up a short conference call.

Greg

Gregory Fried  
Chief, Stationary Source Enforcement Branch  
Office of Enforcement and Compliance Assurance  
U.S. Environmental Protection Agency  
202-564-7016  
[fried.gregory@epa.gov](mailto:fried.gregory@epa.gov)

---

**From:** Traylor, Patrick

**Sent:** Monday, June 18, 2018 4:35 PM

**To:** Ramiro Garcia ([ramiro.garcia@tceq.texas.gov](mailto:ramiro.garcia@tceq.texas.gov)) <[ramiro.garcia@tceq.texas.gov](mailto:ramiro.garcia@tceq.texas.gov)>

**Cc:** Thompson, Steve <[thompson.steve@epa.gov](mailto:thompson.steve@epa.gov)>; Fried, Gregory

<[Fried.Gregory@epa.gov](mailto:Fried.Gregory@epa.gov)>; [susan.johnson@tceq.texas.gov](mailto:susan.johnson@tceq.texas.gov);

[david.ramirez@tceq.texas.gov](mailto:david.ramirez@tceq.texas.gov); Idsal, Anne <[idsal.anne@epa.gov](mailto:idsal.anne@epa.gov)>; Gray, David

<[gray.david@epa.gov](mailto:gray.david@epa.gov)>

**Subject:** Draft O&G Design Audit Checklist

Ramiro:

Thanks for taking the time last week to speak with me about enforcement by TCEQ in the oil and gas sector.

As we discussed, I'm attaching a draft, one-page "checklist" for use in O&G vapor control audits for TCEQ's consideration. We kept it short and consistent with the Devon administrative order and our own draft O&G sector audit program. As such, it represents a good distillation of what we've learned around the country as we have inspected O&G facilities and engaged with companies that have proceeded to evaluate design issues under EPA's audit policies. We hope that Texas will find it useful for its own audit program, and to that end, we would invite you to engage with us on whether this checklist will meet the state's needs as it expands its audit inquiries into questions of design, particularly in the Encana and Chesapeake systems. Steve Thompson from Region 6 and Greg Fried from Headquarters will be our main points of contact for this purpose.

Also, I wanted to let you know that we have invited Keith Sheedy from TCEQ to attend the meeting we're having on June 28 to discuss EPA's O&G audit program. We also invited Lori Wrotenbery at the Railroad Commission. I'll forward the invitation to you under separate cover.

Warm regards,  
Patrick

**Patrick Traylor**

Deputy Assistant Administrator

Office of Enforcement and Compliance Assurance

U.S. Environmental Protection Agency

(202) 564-5238 (office)

Ex. 6 (cell)

Message

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**From:** Traylor, Patrick [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=B6D06C6B766C4B4B8BFD6B0FEA4B998-TRAYLOR, PA]  
**Sent:** 7/13/2018 8:26:47 PM  
**To:** Brooks, Phillip [Brooks.Phillip@epa.gov]  
**Subject:** RE: MarkWest  
**Attachments:** MarkWest Settlement Talking Points (July 13, 2018).docx; Western Pennsylvania Trip Talking Points (July 13, 2018).docx

Thanks. I recrafted them as higher level talkers. Thanks for the baseline info. FYSA, I'm also attaching the O&G sector engagement and new owner audit program talkers I prepared for him.

**Patrick Traylor**  
Deputy Assistant Administrator  
Office of Enforcement and Compliance Assurance  
U.S. Environmental Protection Agency  
(202) 564-5238 (office)

**Ex. 6** (cell)

---

**From:** Brooks, Phillip  
**Sent:** Friday, July 13, 2018 4:12 PM  
**To:** Traylor, Patrick <traylor.patrick@epa.gov>  
**Subject:** Fwd: MarkWest

The team had a couple of small tweaks to my suggested paragraph for the Administrator. The email upgrade cost a little disruption in our communications. I do not think these are major changes, but I am forwarding in case you preferred to use this version.

Sent from my iPhone

Begin forwarded message:

**From:** "Fried, Gregory" <Fried.Gregory@epa.gov>  
**Date:** July 13, 2018 at 3:54:34 PM EDT  
**To:** "Caballero, Kathryn" <Caballero.Kathryn@epa.gov>, "Brooks, Phillip" <Brooks.Phillip@epa.gov>  
**Cc:** "Williams, Christopher" <Williams.Christopher@epa.gov>  
**Subject:** RE: MarkWest

Looks good to me.

---

**From:** Caballero, Kathryn  
**Sent:** Friday, July 13, 2018 3:52 PM  
**To:** Brooks, Phillip <Brooks.Phillip@epa.gov>  
**Cc:** Williams, Christopher <Williams.Christopher@epa.gov>; Fried, Gregory <Fried.Gregory@epa.gov>  
**Subject:** FW: MarkWest

Please see the slightly revised version below from Chris and me. Thanks.

**Deliberative Process / Ex. 5**

# **Deliberative Process / Ex. 5**

Kathryn Pirrotta Caballero  
Senior Attorney  
U.S. EPA Office of Civil Enforcement  
Air Enforcement Division  
(w) 202-564-1849

Mailing Address for USPS:  
1200 Pennsylvania Avenue, N.W.  
Mail Code 2242A  
Washington, D.C. 20460

Mailing/Delivery Address for other carriers and for couriers:  
1200 Pennsylvania Avenue, N.W.  
Clinton Federal Building (South) Room 1147A  
Washington, D.C. 20004

# Western Pennsylvania Trip—Enforcement Talking Points

## I. Oil and Gas Stakeholder Engagement

- In July 2017, Administrator Pruitt committed to holding a roundtable with the oil and gas industry, states, tribes, and ENGOS to “discuss industry concerns and enhance communication while ensuring safe and responsible domestic oil and gas production.”
- EPA convened a two-day roundtable in Denver in February 2018 with senior political representatives and career staff from Regions 6 and 8, OECA, OW, OAR, and OP. The major themes that emerged from the roundtable were:
  - the need for certainty and consistency in regulations, permit, and compliance assurance activities; and
  - the need for greater collaboration and communication between all stakeholders in this sector.
- EPA shared these themes with state regulators at the March ECOS meeting and the April Interstate Oil and Gas Compact Commission meeting, with positive responses.

## II. Oil and Gas Sector New Owner Audit Program

- EPA has had a voluntary self-disclosure program since 2000, which encourages voluntary discovery, disclosure, and correction of environmental non-compliance.
- Since 2008, EPA has had a audit policy providing more flexibility for new owners of facilities that conduct voluntary compliance audits and correct non-compliance.
- This spring, EPA announced that it was developing a special new owner audit program for the oil and gas sector. The new program is designed to solve some of the inefficiencies of using the 2008 policy—designed for one or two major facilities—in the oil and gas sector, where a new owner might acquire hundreds of individual well pad facilities at a time. Range Resources is using the 2008 policy. Its constructive feedback on the inefficiencies of that policy led to the development of the new sector-specific program.
- The program is focused on ensuring that new owners confirm that the design of vapor controls at well pads comply with federal and state regulations to control the emission of ozone-forming volatile organic compounds (VOCs).
- EPA convened a stakeholder engagement process and is taking informal comment on the draft program, which it aims to finalize this fall.

[Note: DAA Patrick Traylor is the main point of contact for the agency on both these efforts.]

July 13, 2018

Message

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**From:** Branning, Hannah [Branning.Hannah@epa.gov]  
**Sent:** 7/23/2018 7:59:28 PM  
**To:** Traylor, Patrick [traylor.patrick@epa.gov]  
**CC:** Shiffman, Cari [Shiffman.Cari@epa.gov]  
**Subject:** Materials for the Region 8 / NEIC Visit  
**Attachments:** Region 8 Visit Materials 7.25.18.pdf; Region 8 Logistics.pdf; NEIC Visit Materials 7.26.18.pdf

Patrick,

Attached are the materials for the upcoming Region 8 and NEIC visits.

Let me know if you need anything else.

Thanks,

Hannah Branning, MSc.  
Special Assistant  
Office of Enforcement and Compliance Assurance  
U.S. Environmental Protection Agency  
1200 Pennsylvania Avenue NW MC 2201A  
Washington, DC 20460

Office: (202) 564-3317 | Cell: Ex. 6



## Message

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**From:** Traylor, Patrick [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=B6D06C6B766C4B4B8BFD6B0FEA4B998-TRAYLOR, PA]  
**Sent:** 6/1/2018 10:49:13 PM  
**To:** Chapman, Apple [Chapman.Apple@epa.gov]  
**Subject:** Fwd: Undeliverable: Oil and Gas Audit Program Invitation  
**Attachments:** mime-attachment; ATT00001.htm; Oil and Gas Audit Program Invitation; ATT00002.htm

This is the only address that bounced back.

### Patrick Traylor

Deputy Assistant Administrator  
Office of Enforcement and Compliance Assurance  
U.S. Environmental Protection Agency  
(202) 564-5238 (office)  
**Ex. 6** (cell)

Begin forwarded message:

**From:** Microsoft Outlook  
<MicrosoftExchange329e71ec88ae4615bbc36ab6ce41109e@usepa.onmicrosoft.com>  
**Date:** June 1, 2018 at 6:16:10 PM EDT  
**To:** <traylor.patrick@epa.gov>  
**Subject: Undeliverable: Oil and Gas Audit Program Invitation**



Your message to [john.hendrix@alaska.gov](mailto:john.hendrix@alaska.gov) couldn't be delivered.

[john.hendrix](#) wasn't found at [alaska.gov](#).

**traylor.patrick**  
Action Required

**Office 365**

**john.hendrix**  
Recipient

Unknown To address

## How to Fix It

The address might be misspelled or might not exist. Try one or more of the following:

- **Retype the recipient's address, then resend the message** - If you're using Outlook, open this non-delivery report message and click **Send Again** from the menu or ribbon. In Outlook on the web, select this message, and then click the "**To send this message again, click here.**" link located just above the message preview window. In the To or Cc line, delete and then retype the entire recipient's address (ignore any address suggestions). After typing the complete address, click **Send** to resend the message. If you're using an email program other than Outlook or Outlook on the web, follow its standard way for resending a message. Just be sure to delete and retype the recipient's entire address before resending it.

- **Remove the recipient from the recipient Auto-Complete List, then resend the message** - If you're using Outlook or Outlook on the web, follow the steps in the "Remove the recipient from the recipient Auto-Complete List" section of [this article](#). Then resend the message. Be sure to delete and retype the recipient's entire address before clicking **Send**.
- **Contact the recipient by some other means**, (by phone, for example) to confirm you're using the right address. Ask them if they've set up an email forwarding rule that could be forwarding your message to an incorrect address.

If the problem continues, ask the recipient to tell their email admin about the problem, and give them the error (and the name of the server that reported it) shown below. It's likely that only the recipient's email admin can fix this problem.

*Was this helpful? [Send feedback to Microsoft](#).*

---

## More Info for Email Admins

*Status code: 550 5.4.1*

This error occurred because a message was sent to an email address hosted by Office 365, but the address doesn't exist in the receiving organization's Office 365 directory. Directory Based Edge Blocking (DBEB) is enabled for [alaska.gov](#), and DBEB rejects messages addressed to recipients who don't exist in the receiving organization's Office 365 directory. This error is reported by the recipient domain's email server, but most often it can be fixed by the person who sent the message. If the steps in the **How to Fix It** section above don't fix the problem, and you're the email admin for the recipient, try one or more of the following:

**Check that the email address exists and is correct** - Confirm that the recipient address exists in your Office 365 directory, is correct, and is accepting messages.

**Synchronize your directories** - Make sure directory synchronization is working correctly, and that the recipient's email address exists in both Office 365 and in your on-premises directory.

**Check for errant forwarding rules** - Check for forwarding rules for the original recipient that might be trying to forward the message to an invalid address. Forwarding can be set up by an admin via mail flow rules or mailbox forwarding address settings, or by the recipient via the Forwarding or Inbox Rules features.

**Make sure the recipient has a valid license** - Make sure the recipient has an Office 365 license assigned to them. The recipient's email admin can use the Office 365 admin center to assign a license to them (Users > Active Users > Select the recipient > Assigned License > Edit).

**Make sure that mail flow settings and MX records are correct** - Misconfigured mail flow or MX record settings can cause this error. Check your Office 365 mail flow settings to make sure your domain and any mail flow connectors are set up correctly. Also, work with your domain registrar to make sure the MX records for your domain are set up correctly.

For more information and additional tips to fix this issue, see [this article](#).

## Original Message Details

Created Date: 6/1/2018 10:16:09 PM

Sender Address: [traylor.patrick@epa.gov](mailto:traylor.patrick@epa.gov)  
Recipient Address: [john.hendrix@alaska.gov](mailto:john.hendrix@alaska.gov)  
Subject: Oil and Gas Audit Program Invitation

## Error Details

Reported error: 550 5.4.1 [[john.hendrix@alaska.gov](mailto:john.hendrix@alaska.gov)]: Recipient address rejected: Access denied [[DM2GCC01FT005.eop-gcc01.prod.protection.outlook.com](mailto:DM2GCC01FT005.eop-gcc01.prod.protection.outlook.com)]  
DSN generated by: [BN6PR09MB1426.namprd09.prod.outlook.com](mailto:BN6PR09MB1426.namprd09.prod.outlook.com)  
Remote server: [DM2GCC01FT005.mail.protection.outlook.com](mailto:DM2GCC01FT005.mail.protection.outlook.com)

## Message Hops

HOP	TIME (UTC)	FROM	TO	WITH
1	6/1/2018 10:16:09 PM	<a href="mailto:BN6PR09MB2034.namprd09.prod.outlook.com">BN6PR09MB2034.namprd09.prod.outlook.com</a>	<a href="mailto:BN6PR09MB2034.namprd09.prod.outlook.com">BN6PR09MB2034.namprd09.prod.outlook.com</a>	mapi
2	6/1/2018 10:16:09 PM	<a href="mailto:BN6PR09MB2034.namprd09.prod.outlook.com">BN6PR09MB2034.namprd09.prod.outlook.com</a>	<a href="mailto:BN6PR09MB1426.namprd09.prod.outlook.com">BN6PR09MB1426.namprd09.prod.outlook.com</a>	Microsoft SM cipher=TLS_E

## Original Message Headers

DKIM-Signature: v=1; a=rsa-sha256; c=relaxed/relaxed;  
d=usepa.onmicrosoft.com;

s=selector1-epa-gov;

h=From:Date:Subject:Message-ID:Content-Type:MIME-Version:X-MS-Exchange-  
SenderADCheck;

bh=OemdJEB02+TYZzvw3GFWLVdvp4h6A/9xpQrfePSe98A8=;

b=Ep0PEJ1YrHwuspcX+hRhQPB69Ax6X4c47s+A5SWBhNFMfbXDUOqagHEDcoVC2cOMgLRnNwVggvF  
DXhWJfAeOes3qDNeASJ4Wk8wNl18rvqeX0xboqIsKBESs7/VVzCpVMaubAcQX2Tiva+B4NcQJtZm8  
S3IXR2LOFi3lxtt9f4A=

Received: from [BN6PR09MB2034.namprd09.prod.outlook.com](mailto:BN6PR09MB2034.namprd09.prod.outlook.com) (10.173.160.9) by  
[BN6PR09MB1426.namprd09.prod.outlook.com](mailto:BN6PR09MB1426.namprd09.prod.outlook.com) (10.173.202.14) with Microsoft SMTP  
Server (version=TLS1\_2, cipher=TLS\_ECDHE\_RSA\_WITH\_AES\_256\_GCM\_SHA384) id  
15.20.820.11; Fri, 1 Jun 2018 22:16:09 +0000

Received: from [BN6PR09MB2034.namprd09.prod.outlook.com](mailto:BN6PR09MB2034.namprd09.prod.outlook.com)  
([fe80::80c9:b678:dd02:a9a8]) by [BN6PR09MB2034.namprd09.prod.outlook.com](mailto:BN6PR09MB2034.namprd09.prod.outlook.com)  
([fe80::80c9:b678:dd02:a9a8%6]) with mapi id 15.20.0820.010; Fri, 1 Jun 2018  
22:16:09 +0000

From: "Traylor, Patrick" <[traylor.patrick@epa.gov](mailto:traylor.patrick@epa.gov)>

CC: "Chapman, Apple" <[Chapman.Apple@epa.gov](mailto:Chapman.Apple@epa.gov)>, "Kenney, James"

<[Kenney.James@epa.gov](mailto:Kenney.James@epa.gov)>, "Sullivan, Tim" <[Sullivan.Tim@epa.gov](mailto:Sullivan.Tim@epa.gov)>, "Williams,  
Christopher" <[Williams.Christopher@epa.gov](mailto:Williams.Christopher@epa.gov)>, "Fried, Gregory"

<[Fried.Gregory@epa.gov](mailto:Fried.Gregory@epa.gov)>, "Hoyt, Daniel" <[Hoyt.Daniel@epa.gov](mailto:Hoyt.Daniel@epa.gov)>

Subject: Oil and Gas Audit Program Invitation

Thread-Topic: Oil and Gas Audit Program Invitation

Thread-Index: AdP59M0tWqlA87IzTNOcEuH3wFkmIQ==

Date: Fri, 1 Jun 2018 22:16:09 +0000  
Message-ID:  
<BN6PR09MB203403DF24A8E5D9FBA22554E9620@BN6PR09MB2034.namprd09.prod.outlook.com>  
Accept-Language: en-US  
Content-Language: en-US  
X-MS-Has-Attach: yes  
X-MS-TNEF-Correlator:  
authentication-results: spf=none (sender IP is )  
smtp.mailfrom=traylor.patrick@epa.gov;  
x-originating-ip: [134.67.29.78]  
x-ms-publictraffictype: Email  
x-microsoft-exchange-diagnostics:  
1;BN6PR09MB1426;7:JT/+zE+qtvhkCoDjlg9DHM8U/WMiWRxshnSfLEQsS05Z4MJ7hFFtFDAvuUH  
sbbv8auEaWxDZ7P9zBSqPFUDNm2Zlaor/prWp+nNqrWKQ4VkJg3tyz72XpJweUGeNO/Ari37+azBV  
uz2qEI48Ly+mJdDloZo2fOmYC86DfFRfT89arD0uWDCq+G8+ykyt80rUfvxyr+n9xsa2Q3WI/LEC  
SewtY7qhIUwjQ/DO5YlZfjETaHVJxOLqCSulue74ZsV  
x-microsoft-antispam:  
UriScan:;BCL:0;PCL:0;RULEID:(7020095)(4652020)(5600026)(2017052603328)(715306  
0)(49563074)(7193020);SPVR:BN6PR09MB1426;  
z-ms-trafficdiagnostictype: BN6PR09MB1426;  
x-ld-processed: 88b378b3-6748-4867-acf9-76aacbeca6a7,ExtAddr  
x-microsoft-antispam-prvs:  
<BN6PR09MB14262DA0521BEA3B8F7CC648E9620@BN6PR09MB1426.namprd09.prod.outlook.com>  
z-exchange-antispam-report-test:  
UriScan:(28532068793085)(261320762254229)(21748063052155)(229425074694992);  
x-ms-exchange-senderadcheck: 1  
x-exchange-antispam-report-cfa-test:  
BCL:0;PCL:0;RULEID:(102415395)(6040522)(2401047)(5005006)(8121501046)(9300609  
5)(93001095)(3002001)(10201501046)(3231254)(944501410)(52105095)(149027)(1500  
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) (201703061421075)(201703061406153)(20161123562045)(20161123560045)(201611235  
58120)(6072148)(201708071742011)(7699016);SRVR:BN6PR09MB1426;BCL:0;PCL:0;RULE  
ID:;SRVR:BN6PR09MB1426;  
x-forefront-prvs: 0690E5FF22  
z-forefront-antispam-report:  
SFV:NSPM;SFS:(10019020)(346002)(376002)(366004)(396003)(39380400002)(39860400  
002)(189003)(199004)(30594003)(6306002)(105586002)(99286004)(81166006)(741600  
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700001)(486006)(476003)(1671002)(3660700001)(26005)(66066001)(81156014)(86560  
06)(59246006)(8936002)(74316002)(8676002)(102836004)(7736002)(25786009)(61160  
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01)(33656002)(4326008)(54906003)(106356001)(2900100001)(54896002)(5250100002)  
(109986005)(236005)(478600001)(316002)(9686003)(97736004)(55016002);DIR:OUT;S  
FP:1102;SCL:1;SRVR:BN6PR09MB1426;H:BN6PR09MB2034.namprd09.prod.outlook.com;FP  
R:;SPF:None;LANG:en;PTR:InfoNoRecords;MX:1;A:1;  
received-spf: None (protection.outlook.com: epa.gov does not designate  
permitted sender hosts)  
x-microsoft-antispam-message-info:  
MwldXGz5c/DeuQJ51/JhVHC+tSrEKOj5JzgU/IpSc60zePdixoTmcSCvlJdMf799cQH7C/Pbaia3  
97FXLNUeyCLE4xkNwtCZWnA0aQXE6T+LnZnBf6xHDSqj7Qjk3FXfAdRL1cXK6BIUTuzIQjj5eGXID  
L/l+7KAagrEv5p3lVSleOlxplvUTqCo2BJ4DV  
spamdiagnosticoutput: 1:99  
spamdiagnosticmetadata: NSPM

Content-Type: multipart/mixed;

boundary="\_\_004\_\_PN6PR09MB203403DF24A8E5D9FBA22554E9620BN6PR09MB2034namp\_\_"

MIME-Version: 1.0

X-MS-Office365-Filtering-Correlation-Id: 33631591-cla3-4f57-f17c-08d5c80d46fc

X-OriginatorOrg: [epa.gov](http://epa.gov)

X-MS-Exchange-CrossTenant-Network-Message-Id: 33631591-cla3-4f57-f17c-08d5c80d46fc

X-MS-Exchange-CrossTenant-originalarrivaltime: 01 Jun 2018 22:16:09.2934

(UTC)

X-MS-Exchange-CrossTenant-fromentityheader: Hosted

X-MS-Exchange-CrossTenant-id: 88b378b3-6748-4867-acf9-76aacbeca6a7

X-MS-Exchange-Transport-CrossTenantHeadersStamped: EN6PR09MB1426

Message

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**From:** Traylor, Patrick [traylor.patrick@epa.gov]  
**Sent:** 6/1/2018 10:16:09 PM  
**CC:** Chapman, Apple [Chapman.Apple@epa.gov]; Kenney, James [Kenney.James@epa.gov]; Sullivan, Tim [Sullivan.Tim@epa.gov]; Williams, Christopher [Williams.Christopher@epa.gov]; Fried, Gregory [Fried.Gregory@epa.gov]; Hoyt, Daniel [Hoyt.Daniel@epa.gov]  
**Subject:** Oil and Gas Audit Program Invitation  
**Attachments:** OGNO Program Stakeholder Meetings Q&A Document.docx

On May 4, 2018, the EPA made available for public comment a [draft standard audit program agreement tailored for new owners of oil and natural gas exploration and production facilities](#).

At that time, we stated that we would be accepting stakeholder comments on the draft agreement until Monday, June 4, 2018, and conducting outreach to seek individual feedback from states, tribes, the regulated community, environmental NGOs, and other stakeholders. EPA is pleased to announce we are extending the comment period until Monday, July 2, 2018, and we are hosting in-person opportunities to engage on the draft agreement.

On Thursday, June 28, from 1:30 p.m. to 4:00 p.m. (EDT), EPA staff will be hosting a stakeholder meeting in Washington, DC at 1200 Pennsylvania Avenue NW in the William Jefferson Clinton South Building, Room 5213. The purpose of the meeting is to afford stakeholders the opportunity to provide individual, verbal feedback on the draft agreement directly to EPA staff. During the meeting, EPA staff may provide some clarifications on the draft agreement as necessary to help understand your verbal comments. However, EPA staff will not discuss the merits of the draft agreement, negotiate specific changes, or respond to verbal comments. You may participate in this stakeholder meeting for States in-person or by conference call (see registration details below). If you are unable to participate in this stakeholder meeting at this date and time, you are encouraged to provide written comments to EPA by Monday, July 2, 2018. EPA is providing all segments of the oil and natural gas stakeholder community with this opportunity and cannot offer make-up sessions. If you participate at the meeting or provide comments, EPA requests that you do so on an individual basis.

While EPA has made every attempt to inform interested parties of the opportunity to provide individual written comments on the draft agreement and provide verbal comments, we encourage you to share this email with your colleagues in the oil and natural gas stakeholder community.

To register for the in-person meeting please send an email to Apple Chapman at [chapman.apple@epa.gov](mailto:chapman.apple@epa.gov) by 5:00 p.m. (EDT) on Friday, June 22. The subject line of the email should say "Oil and Natural Gas Program Registration." In the body of the email please indicate if you plan to participate in person or by teleconference. Apple will provide you with additional logistics and information in an upcoming message. We have also prepared the attached Q&A document with information regarding meeting logistics. If you have questions about the in-person stakeholder meeting, please contact Apple by email.

We look forward to your participation.

**Patrick Traylor**

Deputy Assistant Administrator  
Office of Enforcement and Compliance Assurance  
U.S. Environmental Protection Agency  
(202) 564-5238 (office)

Ex. 6 (cell)

## **Oil and Gas New Owner Audit Program Agreement Stakeholder Meetings Qs & As**

- **Can the media participate?** *Media may attend the stakeholder meetings, but all media questions will be directed to EPA's Office of Public Affairs.*
- **What will EPA do with verbal and written comments?** *EPA will consider all comments received, and it may make appropriate changes to the Draft Standard Oil and Natural Gas Exploration and Production Facilities New Owner Audit Program Agreement (Draft Agreement) based on those comments.*
- **Will there be a docket of written comments?** *There will not be a docket of written comments submitted to EPA. EPA will prepare a summary of the written comments received on the Draft Agreement, and we will provide that summary [here](#).*
- **Will there be a transcript of verbal comments?** *There will not be a transcript of the verbal comments provided to EPA at the meetings. EPA will prepare a summary of the verbal comments, and we will provide that summary [here](#).*
- **Will the stakeholder meetings be recorded?** *The stakeholder meetings will not be recorded. EPA will prepare a summary of the verbal comments at the meetings, and we will provide that summary [here](#).*
- **Will I receive a confirmation email after I register?** *Yes, you will receive an email from Apple Chapman that confirms your registration and provides additional key meeting details.*
- **Will EPA reimburse travel?** *EPA will not reimburse travel.*
- **What are the building access/security procedures?** *Meeting attendees must bring an acceptable form of photo identification, may be asked to go through a metal detector, and will be signed in by an EPA employee and escorted to the meeting location. Information regarding acceptable forms of photo identification can be found [here](#).*
- **Who specifically from EPA will be participating in the meetings and what is their role?** *Staff from EPA's Air Enforcement Division within the Office of Enforcement and Compliance Assurance will be conducting the meetings. EPA staff may provide some clarifications on the Draft Agreement as necessary to help understand verbal comments. However, EPA staff will not discuss the merits of the Draft Agreement, negotiate changes to the Draft Agreement, or respond to verbal comments.*
- **Can I have more than one individual from my organization participate?** *Space in the meeting room is limited by local fire code. EPA's requests that your organization initially identify one representative to provide verbal comments in person or by phone. If there is*

*space available, individuals identified to provide comments in person may be accompanied one additional person from your organization. Additional individuals from your organization may listen to the meeting by phone. EPA will seek to provide each organization RSVP-ing to the meetings with an opportunity to provide verbal comments – whether in person or by phone – on the organization’s behalf before then providing other individuals from an organization with an opportunity to provide additional comments on the organization’s behalf.*

- **What type of information is EPA seeking?** *EPA is seeking verbal feedback on the Draft Agreement. EPA welcomes feedback on the substance of the Draft Agreement, including, among other things, feedback on whether any Draft Agreement requirements are unclear. EPA will not discuss the Agreement’s merits, negotiate specific changes to the Agreement, or respond to verbal comments. Feedback should be directed to EPA staff – not at or to other stakeholders.*
- **What is EPA’s overall timeline with respect to issuing the final agreement?** *Once EPA completes the feedback process, including the written comment period and the stakeholder meetings, EPA:*
  - (1) Will consider all comments received;*
  - (2) May revise the Draft Agreement based on comments as appropriate; and*
  - (3) Announce and publicize the Final Standard Agreement.**EPA hopes to complete this process by September 2018.*



Message

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**From:** Shiffman, Cari [Shiffman.Cari@epa.gov]  
**Sent:** 6/28/2018 7:41:51 PM  
**To:** Bodine, Susan [bodine.susan@epa.gov]; Starfield, Lawrence [Starfield.Lawrence@epa.gov]; Traylor, Patrick [traylor.patrick@epa.gov]  
**CC:** Branning, Hannah [Branning.Hannah@epa.gov]  
**Subject:** Draft OECA Weekly  
**Attachments:** OECA Weekly Report June 28 2018.docx

Please let me know if you have any questions.

Thanks,

Cari Shiffman, Chief of Staff  
U.S. Environmental Protection Agency  
Office of Enforcement and Compliance Assurance  
Office: (202) 564-2898 | Mobile: Ex. 6

Message

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**From:** Chapman, Apple [Chapman.Apple@epa.gov]  
**Sent:** 6/1/2018 8:52:38 PM  
**To:** Traylor, Patrick [traylor.patrick@epa.gov]  
**CC:** Kenney, James [Kenney.James@epa.gov]; Sullivan, Tim [Sullivan.Tim@epa.gov]; Williams, Christopher [Williams.Christopher@epa.gov]; Fried, Gregory [Fried.Gregory@epa.gov]; Hoyt, Daniel [Hoyt.Daniel@epa.gov]; Porter, Amy [Porter.Amy@epa.gov]; Milton, Philip [Milton.Philip@epa.gov]; Kelley, Rosemarie [Kelley.Rosemarie@epa.gov]  
**Subject:** Draft Q&A documents  
**Attachments:** OGNO Program Stakeholder Meetings - QsAs\_Draft.docx; OG New Owner Program - QsAs - Rev Draft\_06.01.2018.docx

Attached are two separate Q&A documents.

**Deliberative Process / Ex. 5**

**Deliberative Process / Ex. 5**

Have a great weekend.

*Ms. Apple Chapman* | Deputy Director, Air Enforcement Division | U.S. Environmental Protection Agency  
1200 Pennsylvania Ave. NW, Washington DC, 20004 | 202-564-5666 (office) **Ex. 6** (mobile) |

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**From:** Traylor, Patrick  
**Sent:** Friday, June 01, 2018 4:21 PM  
**To:** Chapman, Apple <Chapman.Apple@epa.gov>  
**Cc:** Kenney, James <Kenney.James@epa.gov>; Sullivan, Tim <Sullivan.Tim@epa.gov>; Williams, Christopher <Williams.Christopher@epa.gov>; Fried, Gregory <Fried.Gregory@epa.gov>; Hoyt, Daniel <Hoyt.Daniel@epa.gov>  
**Subject:** Re: stakeholder lists and email text

Thanks; I'll get these out later today.

**Patrick Traylor**  
Deputy Assistant Administrator  
Office of Enforcement and Compliance Assurance  
U.S. Environmental Protection Agency  
(202) 564-5238 (office)  
**Ex. 6** (cell)

On Jun 1, 2018, at 3:05 PM, Chapman, Apple <Chapman.Apple@epa.gov> wrote:

Attached are three separate draft emails for the three separate stakeholder groups. Also attached are the email addresses separated by stakeholder group. You just need to copy and paste into the Bcc line (it works, I tested it earlier today).

**Deliberative Process / Ex. 5**

**Deliberative Process / Ex. 5**

# Deliberative Process / Ex. 5

Please copy me and all the Ccs on the emails you send.

Let me know if you have questions.

Thanks and have a good weekend.

*Ms. Apple Chapman* | Deputy Director, Air Enforcement Division | U.S. Environmental Protection Agency  
1200 Pennsylvania Ave. NW, Washington DC, 20004 | 202-564-5666 (office) | **Ex. 6** (mobile) |

<Industry Email list.docx>

<ENGO List.docx>

<State Email List.docx>

<State Letter.docx>

<Industry letter.docx>

<ENGO letter.docx>

Message

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**From:** Chapman, Apple [Chapman.Apple@epa.gov]  
**Sent:** 6/1/2018 7:05:48 PM  
**To:** Traylor, Patrick [traylor.patrick@epa.gov]  
**CC:** Kenney, James [Kenney.James@epa.gov]; Sullivan, Tim [Sullivan.Tim@epa.gov]; Williams, Christopher [Williams.Christopher@epa.gov]; Fried, Gregory [Fried.Gregory@epa.gov]; Kenney, James [Kenney.James@epa.gov]; Hoyt, Daniel [Hoyt.Daniel@epa.gov]  
**Subject:** stakeholder lists and email text  
**Attachments:** Industry Email list.docx; ENGO List.docx; State Email List.docx; State Letter.docx; Industry letter.docx; ENGO letter.docx

Attached are three separate draft emails for the three separate stakeholder groups. Also attached are the email addresses separated by stakeholder group. You just need to copy and paste into the Bcc line (it works, I tested it earlier today).

Deliberative Process / Ex. 5

## Deliberative Process / Ex. 5

Please copy me and all the Ccs on the emails you send.

Let me know if you have questions.

Thanks and have a good weekend.

**Ms. Apple Chapman** | Deputy Director, Air Enforcement Division | U.S. Environmental Protection Agency  
1200 Pennsylvania Ave. NW, Washington DC, 20004 | 202-564-5666 (office) **Ex. 6** (mobile) |

Message

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**From:** Chapman, Apple [Chapman.Apple@epa.gov]  
**Sent:** 5/24/2018 11:44:00 AM  
**To:** Traylor, Patrick [traylor.patrick@epa.gov]  
**Subject:** Re: Issues I want to learn more about

I will include her.

Sent from my iPhone

On May 23, 2018, at 9:11 PM, Traylor, Patrick <traylor.patrick@epa.gov> wrote:

Please consider adding Denise Bode to the invitation list.

**Patrick Traylor**

Deputy Assistant Administrator  
Office of Enforcement and Compliance Assurance  
U.S. Environmental Protection Agency  
(202) 564-5238 (office)

**Ex. 6** (cell)

Begin forwarded message:

**From:** "A.J. Ferate" <aj@feratepllc.com>  
**Date:** May 23, 2018 at 9:06:02 PM EDT  
**To:** "Traylor, Patrick" <traylor.patrick@epa.gov>  
**Cc:** "dabode@michaelbeststrategies.com" <dabode@michaelbeststrategies.com>  
**Subject:** Re: Issues I want to learn more about

Patrick, I look forward to the invite for the meeting on the 6th. Can you please also include Denise Bode (cc'd) on the invitation? She is a fellow Oklahoman that represents oil and gas interests as well.

Thank you very much, AJF

Anthony J. "A.J." Ferate, JD

**Ex. 6** (cell)

On May 18, 2018, at 12:32, Traylor, Patrick <traylor.patrick@epa.gov> wrote:

A.J.:

As you can imagine, there is a great deal of interest in our proposed New Owner Clean Air Act Audit Program. We are scheduling a meeting with interested state and industry stakeholders on June 6, 2018, in D.C. to talk about the proposal. I have asked my staff to add your name to the invitation list so that you can join us for the discussion.

The Compliance Assistance Center is still in the early stages of development, so I'll need to get back to you on future opportunities to engage with us.

Warm regards,  
Patrick

**Patrick Traylor**  
Deputy Assistant Administrator  
Office of Enforcement and Compliance Assurance  
U.S. Environmental Protection Agency  
(202) 564-5238 (office)  
Ex. 6 (cell)

---

**From:** A.J. Ferate [mailto:aj@feratepllc.com]  
**Sent:** Thursday, May 17, 2018 2:59 PM  
**To:** Greenwalt, Sarah <greenwalt.sarah@epa.gov>  
**Cc:** Woods, Clint <woods.clint@epa.gov>; Gunasekara, Mandy <Gunasekara.Mandy@epa.gov>; Bodine, Susan <bodine.susan@epa.gov>; Traylor, Patrick <traylor.patrick@epa.gov>  
**Subject:** Re: Issues I want to learn more about

Thank you so much, Sarah. Any opportunity to learn about the proposals would be helpful. Thanks again! AJF

---

Anthony J. "A.J." Ferate, JD  
Ex. 6 (cell)

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**From:** Greenwalt, Sarah <greenwalt.sarah@epa.gov>  
**Sent:** Thursday, May 17, 2018 1:32:30 PM  
**To:** A.J. Ferate  
**Cc:** Woods, Clint; Gunasekara, Mandy; Bodine, Susan; Traylor, Patrick  
**Subject:** RE: Issues I want to learn more about

Good to hear from you, A.J. I've cc'ed Mandy and Clint from the Office of Air and Radiation who should be able to connect you with the right folks regarding the proposed New Owner Clean Air Audit Program.

I've also cc'ed Susan and Patrick from the Office of Enforcement and Compliance Assurance who should be able to connect you with the right folks regarding the proposal for an Energy Extraction Compliance Assistance Center.

Best,

**Sarah A. Greenwalt**

U.S. Environmental Protection Agency  
Work: 202-564-1722 | Cell: Ex. 6  
[Greenwalt.Sarah@epa.gov](mailto:Greenwalt.Sarah@epa.gov)

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**From:** A.J. Ferate [<mailto:aj@feratepllc.com>]  
**Sent:** Thursday, May 17, 2018 11:00 AM  
**To:** Greenwalt, Sarah <[greenwalt.sarah@epa.gov](mailto:greenwalt.sarah@epa.gov)>  
**Subject:** Issues I want to learn more about

I hope all is well, Sarah. When I come out next week I'd be interested in meeting with someone whom might have information on:

- a) the proposed New Owner Clean Air Audit Program, and;
- b) the proposal for an Energy Extraction Compliance Assistance Center

I'm putting together my schedule right now, but other than the Judiciary Committee hearing I'm generally open Tuesday afternoon through 11am Thursday.

Thank you in advance! AJF

---

Anthony J. "A.J." Ferate, JD  
Ex. 6 (cell)

Message

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**From:** Traylor, Patrick [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=B6D06C6B766C4B4B8BFD6B0FEA4B998-TRAYLOR, PA]  
**Sent:** 5/4/2018 3:48:17 PM  
**To:** Hull, George [Hull.George@epa.gov]  
**Subject:** RE: Audit Template  
**Attachments:** OG New Owner Program - Audit Agreement - Draft\_Clean\_05.04.2018.docx

With attachment . . . .

**Patrick Traylor**  
Deputy Assistant Administrator  
Office of Enforcement and Compliance Assurance  
U.S. Environmental Protection Agency  
(202) 564-5238 (office)  
**Ex. 6** (cell)

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**From:** Traylor, Patrick  
**Sent:** Friday, May 4, 2018 11:46 AM  
**To:** Hull, George <Hull.George@epa.gov>  
**Subject:** Audit Template

George:

**Deliberative Process / Ex. 5**

**Deliberative Process / Ex. 5**

Let's get together and finalized the web content, etc.

Thanks,  
Patrick

**Patrick Traylor**  
Deputy Assistant Administrator  
Office of Enforcement and Compliance Assurance  
U.S. Environmental Protection Agency  
(202) 564-5238 (office)  
**Ex. 6** (cell)



Message

---

**From:** A.J. Ferate [aj@feratepllc.com]  
**Sent:** 5/24/2018 1:12:20 AM  
**To:** Traylor, Patrick [traylor.patrick@epa.gov]  
**CC:** dabode@michaelbeststrategies.com  
**Subject:** Re: Issues I want to learn more about

Thank you. I will be coming in from OKC, so as much notice as possible will be helpful. Thanks again. AJF

Anthony J. "A.J." Ferate, JD

**Ex. 6** (cell)

On May 23, 2018, at 21:10, Traylor, Patrick <traylor.patrick@epa.gov> wrote:

I'll be sure to do that. The meeting date is still in flux, so please be on the lookout for an invitation from me with the updated date.

**Patrick Traylor**

Deputy Assistant Administrator  
Office of Enforcement and Compliance Assurance  
U.S. Environmental Protection Agency  
(202) 564-5238 (office)  
**Ex. 6** (cell)

On May 23, 2018, at 9:06 PM, A.J. Ferate <aj@feratepllc.com> wrote:

Patrick, I look forward to the invite for the meeting on the 6th. Can you please also include Denise Bode (cc'd) on the invitation? She is a fellow Oklahoman that represents oil and gas interests as well.

Thank you very much, AJF

Anthony J. "A.J." Ferate, JD

**Ex. 6** (cell)

On May 18, 2018, at 12:32, Traylor, Patrick <traylor.patrick@epa.gov> wrote:

A.J.:

As you can imagine, there is a great deal of interest in our proposed New Owner Clean Air Act Audit Program. We are scheduling a meeting with interested state and industry stakeholders on June 6, 2018, in D.C. to talk about the proposal. I have asked my staff to add your name to the invitation list so that you can join us for the discussion.

The Compliance Assistance Center is still in the early stages of development, so I'll need to get back to you on future opportunities to engage with us.

Warm regards,  
Patrick

**Patrick Traylor**  
Deputy Assistant Administrator  
Office of Enforcement and Compliance Assurance  
U.S. Environmental Protection Agency  
(202) 564-5238 (office)  
**Ex. 6** (cell)

---

**From:** A.J. Ferate [mailto:aj@feratepllc.com]  
**Sent:** Thursday, May 17, 2018 2:59 PM  
**To:** Greenwalt, Sarah <greenwalt.sarah@epa.gov>  
**Cc:** Woods, Clint <woods.clint@epa.gov>; Gunasekara, Mandy <Gunasekara.Mandy@epa.gov>; Bodine, Susan <bodine.susan@epa.gov>; Traylor, Patrick <traylor.patrick@epa.gov>  
**Subject:** Re: Issues I want to learn more about

Thank you so much, Sarah. Any opportunity to learn about the proposals would be helpful. Thanks again! AJF

---

Anthony J. "A.J." Ferate, JD  
**Ex. 6** (cell)

---

**From:** Greenwalt, Sarah <greenwalt.sarah@epa.gov>  
**Sent:** Thursday, May 17, 2018 1:32:30 PM  
**To:** A.J. Ferate  
**Cc:** Woods, Clint; Gunasekara, Mandy; Bodine, Susan; Traylor, Patrick  
**Subject:** RE: Issues I want to learn more about

Good to hear from you, A.J. I've cc'ed Mandy and Clint from the Office of Air and Radiation who should be able to connect you with the right folks regarding the proposed New Owner Clean Air Audit Program.

I've also cc'ed Susan and Patrick from the Office of Enforcement and Compliance Assurance who should be able to connect you with the right folks regarding the proposal for an Energy Extraction Compliance Assistance Center.

Best,

**Sarah A. Greenwalt**

U.S. Environmental Protection Agency  
Work: 202-564-1722 | Cell: **Ex. 6**  
[Greenwalt.Sarah@epa.gov](mailto:Greenwalt.Sarah@epa.gov)

---

**From:** A.J. Ferate [mailto:aj@feratepllc.com]  
**Sent:** Thursday, May 17, 2018 11:00 AM  
**To:** Greenwalt, Sarah <greenwalt.sarah@epa.gov>  
**Subject:** Issues I want to learn more about

I hope all is well, Sarah. When I come out next week I'd be interested in meeting with someone whom might have information on:

- a) the proposed New Owner Clean Air Audit Program, and;
- b) the proposal for an Energy Extraction Compliance Assistance Center

I'm putting together my schedule right now, but other than the Judiciary Committee hearing I'm generally open Tuesday afternoon through 11am Thursday.

Thank you in advance! AJF

---

Anthony J. "A.J." Ferate, JD  
(202) 274-1111 cell)  
Ex. 6

Message

---

**From:** Traylor, Patrick [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=B6D06C6B766C4B4B8BFD6B0FEA4B998-TRAYLOR, PA]  
**Sent:** 5/18/2018 4:02:39 PM  
**To:** Kenney, James [Kenney.James@epa.gov]  
**Subject:** RE: Oil and Gas Remarks  
**Attachments:** Oil and Gas New Owner Program Talking Points (May 4, 2018).pdf

No questions. Also, I sent Doug my handwritten talking points that I used at IOGCC about the new audit program (attached).

**Patrick Traylor**

Deputy Assistant Administrator  
Office of Enforcement and Compliance Assurance  
U.S. Environmental Protection Agency  
(202) 564-5238 (office)

**Ex. 6** (cell)

---

**From:** Kenney, James  
**Sent:** Tuesday, May 15, 2018 12:21 PM  
**To:** Traylor, Patrick <traylor.patrick@epa.gov>  
**Subject:** RE: Oil and Gas Remarks

Hi Patrick,  
Attached please find the draft national level talkers for Doug.

**Deliberative Process / Ex. 5**

**Deliberative Process / Ex. 5**

Thanks,  
Jim

--  
Jim

Desk/Mobile: **Ex. 6**

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**From:** Traylor, Patrick  
**Sent:** Monday, May 14, 2018 2:27 PM  
**To:** Kenney, James <Kenney.James@epa.gov>  
**Subject:** RE: Oil and Gas Remarks

Sounds good.

**Patrick Traylor**

Deputy Assistant Administrator  
Office of Enforcement and Compliance Assurance  
U.S. Environmental Protection Agency  
(202) 564-5238 (office)

**Ex. 6** (cell)

---

**From:** Kenney, James  
**Sent:** Monday, May 14, 2018 2:53 PM

To: Traylor, Patrick <traylor.patrick@epa.gov>

Subject: Oil and Gas Remarks

Hi Patrick,

Doug Benevento is scheduled to participate in a panel discussion at the Williston Basin Petroleum conference on May 23<sup>rd</sup> in Bismarck.

Deliberative Process / Ex. 5

# Deliberative Process / Ex. 5

Here's some more on Doug's session:

3:00-4:30 pm - Regulation: New Day – Better Way! | Location: Exhibit Hall D

Session Chairs: Zac Weis, *Government & Community Relations Manager, Marathon Oil*

Alan Olson, *Executive Director, Montana Petroleum Association*

Douglas Benevento, *EPA Region 8 Administrator*

Dave Glatt, *Chief of the North Dakota Department of Health Environmental Health Section*

Wayne Stenehjem, *North Dakota Attorney General*

Tim Fox, *Montana Attorney General*

Thanks,

Jim

--

James C. Kenney | Senior Policy Advisor for Unconventional Oil and Gas | US EPA

Desk/Mobile: Ex. 6 Email: [kenney.james@epa.gov](mailto:kenney.james@epa.gov)

**Please note:** I am geographically located in Albuquerque, New Mexico (Mountain Time Zone).

This message may contain deliberative, attorney-client or otherwise privileged material. Do not release this message without the appropriate review.

If you are not the intended recipient, kindly advise and delete this message/attachments. Namaste.

## OBG CAA NEW OWNER AUDIT PROGRAM TALKING POINTS

NATIONAL ENFORCEMENT INITIATIVE FOR ENERGY EXTRACTION IDENTIFIED WIDESPREAD EXCESS EMISSIONS RELATED TO THE DESIGN OF VAPOR CONTROLS AT STORAGE TANKS AT OIL & GAS EXPLORATION AND PRODUCTION FACILITIES.

FORMAL ENFORCEMENT HAS GENERATED A NUMBER OF SETTLEMENTS COVERING OVER A THOUSAND WELL PADS (PDC, SLAWSON, XTO, DEVON, NOBLE).

2008 NEW OWNER AUDIT POLICY — IF QUALIFIES & CORRECTS, EPA CAN WAIVE PENALTIES, AVOID THE ~~CO~~ DELAYS ASSOCIATED W/ FORMAL ENFORCEMENT, GET TO COMPLIANCE, AND PROVIDE REPOSE

A NUMBER OF NEW OWNERS HAVE USED TO 2008 NEW OWNER POLICY. WE HAVE LEARNED THAT THE 2008 POLICY WORKS BEST FOR SINGLE/SEVERAL SITES, BUT HAS SIGNIFICANT INEFFICIENCIES WHEN HUNDREDS OF FAR-FLUNG FACILITIES ARE INVOLVED.

-|-

THESE INEFFICIENCIES RESULTED IN SPENDING A GREAT DEAL OF TIME NEGOTIATING CUSTOMIZED AUDIT AGREEMENTS AND MODIFYING AUDIT TOOLS MEANT FOR A SMALL # OF FACILITIES INTO THOSE THAT WOULD WORK FOR MANY FACILITIES.

THIS INEFFICIENCY AND UNCERTAINTY MADE IT MORE DIFFICULT FOR WOULD-BE AUDITING COMPANIES TO KNOW THAT THEY COULD COME IN, COME INTO COMPLIANCE, AND RESOLVE THEIR RISK OF ENFORCEMENT.

THAT'S A POOR OUTCOME FOR COMPANIES THAT WANT TO CORRECT THEIR PREDECESSORS' NON-COMPLIANCE.

SO WE DECIDED TO IMPROVE OUR PROCESS. THAT'S THIS NEW OWNER AUDIT PROGRAM FOR O&G SECTOR.

BEFORE I GET INTO THE DETAILS, I WANT TO SAY TWO THINGS THAT ARE VERY IMPORTANT

FIRST, THIS NEW PROGRAM DOES NOT ~~SUBSTITUTE FORMAL~~ TAKE THE PLACE OF FORMAL ENFORCEMENT. OECA REGULATORY ENFORCEMENT HAS TWO STRATEGIC GOALS — FOSTER COMPLIANCE AND UNCOVER NON-COMPLIANCE. BOTH ARE ESSENTIAL. AND BOTH HAVE COMPLIANCE AS THE DESIRED OUTCOME SO WE'LL USE THE MOST APPROPRIATE TOOL TO GET TO COMPLIANCE. IF IT CAN BE A NEW OWNER AUDIT, GREAT — THAT'S EASIER FOR EVERYONE. BUT IF IT NEEDS TO BE, FORMAL ENFORCEMENT, WE HAVEN'T BEEN AND WON'T BE SHY ABOUT BRINGING CASES.

#### NEW PROGRAM

SECOND, THIS HAS BEEN LED BY CAREER STAFF FROM THE BEGINNING. THE SAME STAFF WHO ARE ZEALOUS ADVOCATES FOR COMPLIANCE IN FORMAL ENFORCEMENT ARE ALSO THE ONES THAT WILL WORK COOPERATIVELY W/ COMPANIES WHO APPROACH US IN GOOD FAITH TO RESOLVE PAST NON-COMPLIANCE. GREAT STAFF.



## NOW THE DETAILS

- ① WE'VE CRAFTED A STANDARD TEMPLATE AUDIT AGREEMENT.
  - AVOIDS CUSTOM AGREEMENTS
  - THE REGULATED COMMUNITY KNOWS THE ~~DATA~~ BEFORE THEY WALK IN REQUIREMENTS & BENEFITS
- ② CDS HAVE 6 MONTHS AFTER AN ACQUISITION TO COME IN. WE'D EXPECT A QUICK TEMPLATE AGREEMENT SO THE WORK CAN START.
- ③ TRANSITION RULE WILL COVER ACQUISITIONS THAT CLOSED UP TO 12 MONTHS BEFORE WE FINISH THE ~~to~~ NEW PROGRAM.
- ④ FOCUSED ON ASSESSING WHETHER VAPOR CONTROLS ARE DESIGNED PROPERLY → CO CAN AUDIT ANYTHING ELSE ~~UNDERLINE~~ IT WOULD LIKE, BUT NO LESS THAN VAPOR CONTROL DESIGN

⑤ WILL WORK OUT THE TIMING OF THE AUDIT AND CORRECTIVE ACTION DEPENDING ON THE # OF FACILITIES.

⑥ AFTER NON-COMPLIANCE IS CORRECTED, EPA WILL ISSUE A FINAL DETERMINATION THAT RESOLVES THE COMPANY'S LIABILITY. WE WOULD EXPECT THAT THERE WOULD BE NO-PENALTY RESOLUTIONS, NO CULPABILITY-FUL PAST, PRE-ACQUISITION NON-COMPLIANCE.

⑦ TECHNICAL REQUIREMENTS

- MODELING GUIDELINE
- ENGINEER DESIGN STANDARDS
- FIELD SURVEY/ENGINEERING EVALUATION
- VCS MOD/VERIFICATION

FINALLY, THIS IS NOT A TAKE IT OR LEAVE IT PROPOSITION - THE 2000 AND 2008 POLICIES ARE STILL IN PLACE FOR APPROPRIATE SELF-DISCLOSURES, THOUGH IN OGG, THIS NEW PROGRAM IS THE PRESUMPTIVE APPROACH.

- 5 -

Message

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**From:** Loving, Shanita [Loving.Shanita@epa.gov]  
**Sent:** 2/12/2018 2:43:46 PM  
**To:** Traylor, Patrick [traylor.patrick@epa.gov]  
**Subject:** RE: Please add me to this Friday's Self-Disclosure Meeting

Will do.

Thanks,

Shanita Loving  
Program Specialist  
Environmental Protection Agency  
IO of the Assist. Administrator of the Office of Enforcement & Compliance Assurance  
1200 Pennsylvania Ave., NW  
WJC-South, Room 3204  
Washington, DC 20460

---

**From:** Traylor, Patrick  
**Sent:** Monday, February 12, 2018 9:42 AM  
**To:** Loving, Shanita <Loving.Shanita@epa.gov>  
**Subject:** Please add me to this Friday's Self-Disclosure Meeting

**Patrick Traylor**  
Deputy Assistant Administrator  
Office of Enforcement and Compliance Assurance  
U.S. Environmental Protection Agency  
(202) 564-5238 (office)  

Ex. 6

 (cell)

Message

---

**From:** Traylor, Patrick [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=B6D06C6B766C4B4B8BFD6B0FEA4B998-TRAYLOR, PA]  
**Sent:** 5/17/2018 8:34:50 PM  
**To:** Chapman, Apple [Chapman.Apple@epa.gov]  
**Subject:** RE: Issues I want to learn more about

Let me know if I can help getting a conference room elsewhere in the building.

**Patrick Traylor**

Deputy Assistant Administrator  
Office of Enforcement and Compliance Assurance  
U.S. Environmental Protection Agency  
(202) 564-5238 (office)

**Ex. 6** (cell)

---

**From:** Chapman, Apple  
**Sent:** Thursday, May 17, 2018 4:23 PM  
**To:** Traylor, Patrick <traylor.patrick@epa.gov>  
**Subject:** Re: Issues I want to learn more about

Ok. We will try to nail down the dates. Depending on the level of interest I may have difficulty getting a conference room that is large enough. That is one of my concerns.

Sent from my iPhone

On May 17, 2018, at 4:07 PM, Traylor, Patrick <traylor.patrick@epa.gov> wrote:

## Deliberative Process / Ex. 5

**Patrick Traylor**

Deputy Assistant Administrator  
Office of Enforcement and Compliance Assurance  
U.S. Environmental Protection Agency  
(202) 564-5238 (office)

**Ex. 6** (cell)

---

**From:** Chapman, Apple  
**Sent:** Thursday, May 17, 2018 2:59 PM  
**To:** Traylor, Patrick <traylor.patrick@epa.gov>  
**Subject:** Re: Issues I want to learn more about

I'm meeting later today with Jim Kenney and Tim Sullivan to discuss this. I'll let you know next week.

Sent from my iPhone

On May 17, 2018, at 2:48 PM, Traylor, Patrick <traylor.patrick@epa.gov> wrote:

## Deliberative Process / Ex. 5

**Patrick Traylor**  
Deputy Assistant Administrator  
Office of Enforcement and Compliance Assurance  
U.S. Environmental Protection Agency  
(202) 564-5238 (office)  
**Ex. 6** (cell)

---

**From:** Greenwalt, Sarah  
**Sent:** Thursday, May 17, 2018 2:33 PM  
**To:** A.J. Ferate <aj@feratepllc.com>  
**Cc:** Woods, Clint <woods.clint@epa.gov>; Gunasekara, Mandy <Gunasekara.Mandy@epa.gov>; Bodine, Susan <bodine.susan@epa.gov>; Traylor, Patrick <traylor.patrick@epa.gov>  
**Subject:** RE: Issues I want to learn more about

Good to hear from you, A.J. I've cc'ed Mandy and Clint from the Office of Air and Radiation who should be able to connect you with the right folks regarding the proposed New Owner Clean Air Audit Program.

I've also cc'ed Susan and Patrick from the Office of Enforcement and Compliance Assurance who should be able to connect you with the right folks regarding the proposal for an Energy Extraction Compliance Assistance Center.

Best,

**Sarah A. Greenwalt**

U.S. Environmental Protection Agency  
Work: 202-564-1722 | Cell: **Ex. 6**  
[Greenwalt.Sarah@epa.gov](mailto:Greenwalt.Sarah@epa.gov)

---

**From:** A.J. Ferate [mailto:aj@feratepllc.com]  
**Sent:** Thursday, May 17, 2018 11:00 AM  
**To:** Greenwalt, Sarah <greenwalt.sarah@epa.gov>  
**Subject:** Issues I want to learn more about

I hope all is well, Sarah. When I come out next week I'd be interested in meeting with someone whom might have information on:

- a) the proposed New Owner Clean Air Audit Program, and;
- b) the proposal for an Energy Extraction Compliance Assistance Center

I'm putting together my schedule right now, but other than the Judiciary Committee hearing I'm generally open Tuesday afternoon through 11am Thursday.

Thank you in advance! AJF

---

Anthony J. "A.J." Ferate, JD

**Ex. 6** (cell)

Message

---

**From:** Kelley, Rosemarie [Kelley.Rosemarie@epa.gov]  
**Sent:** 1/10/2018 11:24:32 PM  
**To:** Traylor, Patrick [traylor.patrick@epa.gov]  
**Subject:** RE: Senior Staff Meeting Question

Patrick—

**Personal Matters / Ex. 6**

# Deliberative Process / Ex. 5

Rosemarie

---

**From:** Traylor, Patrick  
**Sent:** Wednesday, January 10, 2018 2:23 PM  
**To:** Kelley, Rosemarie <Kelley.Rosemarie@epa.gov>  
**Subject:** Senior Staff Meeting Question

Rosemarie:

# Deliberative Process / Ex. 5

Best,  
Patrick

**Patrick Traylor**  
Deputy Assistant Administrator  
Office of Enforcement and Compliance Assurance  
U.S. Environmental Protection Agency  
(202) 564-5238 (office)

**Ex. 6** cell)



Message

---

**From:** Traylor, Patrick [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=B6D06C6B766C4B4B8BFD6B0FEA4B998-TRAYLOR, PA]  
**Sent:** 5/31/2018 3:59:08 PM  
**To:** Bodine, Susan [bodine.susan@epa.gov]  
**CC:** Loving, Shanita [Loving.Shanita@epa.gov]  
**Subject:** Re: Meeting

**Deliberative Process / Ex. 5**

**Patrick Traylor**  
Deputy Assistant Administrator  
Office of Enforcement and Compliance Assurance  
U.S. Environmental Protection Agency  
(202) 564-5238 (office)  
**Ex. 6** (cell)

On May 31, 2018, at 11:20 AM, Bodine, Susan <bodine.susan@epa.gov> wrote:

**Deliberative Process / Ex. 5**

Susan

---

**From:** Loving, Shanita  
**Sent:** Thursday, May 31, 2018 11:17 AM  
**To:** Bodine, Susan <bodine.susan@epa.gov>  
**Subject:** FW: Meeting

Hi Susan,

Please see email below from Mr. Roger Kelley who would like to meet with you to discuss the proposed New Owner Audit Agreement.

Thanks,

Shanita Loving  
Program Specialist  
Environmental Protection Agency  
IO of the Assist. Administrator of the Office of Enforcement & Compliance Assurance  
1200 Pennsylvania Ave., NW  
WJC-South, Room 3204  
Washington, DC 20460  
Phone: (202) 564-4728

---

**From:** Roger Kelley [mailto:Roger.Kelley@clr.com]  
**Sent:** Thursday, May 31, 2018 11:11 AM  
**To:** Loving, Shanita <Loving.Shanita@epa.gov>  
**Subject:** Meeting

Here is my second try. Sorry for the mix up.

Shanita,

Here is the information that you requested for your consideration for a meeting with Ms. Bodine:

- I am with Continental RESOURCES, Inc. and I also chair the Regulatory Committee for the Domestic Energy Producers' Alliance.
- I will be in town on June 6-7 all day both days so far. I have a House hearing at 2:00 pm on the 6<sup>th</sup>.
- I want to talk to her about the proposed New Owner Audit Agreement. We had submitted a request for an extension for review for this rule and understand that Ryan Jackson had sent that to you for consideration. I also want to visit with her about compliance and interaction with state programs.
- Blu Hulsey, our Sr. VP of Government Relations may also be in attendance.

Just as a way of my introduction, I have been in the oil and gas business for about 37 years with time in exploration and production operations as well as environment and regulatory. I have extensive experience with air compliance issues and have worked with the EPA as well as many state programs on compliance and regulatory program development. Please tell Ms. Bodine that I look forward to meeting with her.

**J Roger Kelley**  
Director of Regulatory Affairs

Continental Resources, Inc.  
20 N. Broadway  
OKC, OK 73102

P/F: Ex. 6

C: Ex. 6

[Roger.kelley@clr.com](mailto:Roger.kelley@clr.com)  
[www.clr.com](http://www.clr.com)

Mailing:  
P.O. Box 269000  
OKC, OK 73126

<image001.png>

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be intercepted, corrupted, lost, destroyed, arrive late or incomplete, or contain viruses. The sender therefore does not accept liability for any errors or omissions in the contents of this message which arise as a result of e-mail transmission.

Message

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**From:** Chapman, Apple [Chapman.Apple@epa.gov]  
**Sent:** 3/1/2018 10:13:06 PM  
**To:** Traylor, Patrick [traylor.patrick@epa.gov]  
**Subject:** Re: Meeting re oil and gas compliance issues

Yes. Thursday is better if you want me in person. Ex. 6

Sent from my iPhone

On Mar 1, 2018, at 5:06 PM, Traylor, Patrick <traylor.patrick@epa.gov> wrote:

Would you be able to join me for a 30-minute meeting with Roger next Wednesday or Thursday?

**Patrick Traylor**

Deputy Assistant Administrator  
Office of Enforcement and Compliance Assurance  
U.S. Environmental Protection Agency  
(202) 564-5238 (office)  
Ex. 6 (cell)

---

**From:** Roger Kelley [mailto:Roger.Kelley@clr.com]  
**Sent:** Thursday, March 1, 2018 2:41 PM  
**To:** Traylor, Patrick <traylor.patrick@epa.gov>  
**Subject:** RE: Meeting re oil and gas compliance issues

Great Traylor. Yes, I am very interested in your audit program. I am also concerned about your overall approach to compliance, e.g. state v federal involvement. In particular, the Section 114 based enforcement initiatives that have heretofore been executed. Hopefully this will be a two way meeting where I am also able to answer any questions that you might have regarding operations, etc.

**J Roger Kelley**

Director of Regulatory Affairs

Continental Resources, Inc.

20 N. Broadway

OKC, OK 73102

P/F

Ex. 6

C:

Ex. 6

[Roger.kelley@clr.com](mailto:Roger.kelley@clr.com)

[www.clr.com](http://www.clr.com)

Mailing:

P.O. Box 269000

OKC, OK 73126

---

**From:** Traylor, Patrick [mailto:traylor.patrick@epa.gov]  
**Sent:** Thursday, March 01, 2018 3:32 PM  
**To:** Roger Kelley <Roger.Kelley@clr.com>  
**Subject:** {EXTERNAL}- RE: Meeting re oil and gas compliance issues

**External email – beware of links and attachments**

Roger:

I'd be happy to get together with you next week. It would help me to know more particularly what you'd like to discuss. For example, if you'd like to get into the details on our new O&G sector audit program, it will be better to have a career staff person there with us because they are the ones developing the program.

Best,  
Patrick

**Patrick Traylor**

Deputy Assistant Administrator  
Office of Enforcement and Compliance Assurance  
U.S. Environmental Protection Agency  
(202) 564-5238 (office)

Personal Matters / Ex. 6 (cell)

---

**From:** Roger Kelley [mailto:Roger.Kelley@clr.com]

**Sent:** Thursday, March 1, 2018 11:55 AM

**To:** Traylor, Patrick <traylor.patrick@epa.gov>

**Subject:** Meeting re oil and gas compliance issues

Patrick,

I enjoyed visiting with you at the ECOS Oil and Gas Roundtable and appreciate your input into that meeting. We talked about a possible meeting this next week in DC. I will be available on the afternoon of the 7<sup>th</sup> and most of the day on the 8<sup>th</sup>. I am available for breakfast or lunch meetings as well. I have some meeting set already but would really like to meet with you to discuss compliance issues, especially regarding your self-audit program. Please let me know your schedule. Thanks so much.

Roger K.

**J Roger Kelley**

Director of Regulatory Affairs

Continental Resources, Inc.

20 N. Broadway

OKC, OK 73102

P/F: Ex. 6

C: Ex. 6

[Roger.kelley@clr.com](mailto:Roger.kelley@clr.com)

[www.clr.com](http://www.clr.com)

Mailing:

P.O. Box 269000

OKC, OK 73126

<image001.png>

---

NOTICE: This message contains confidential information and is intended for the individual named. If you are not the named addressee, you should not disseminate, distribute or copy this e-mail. Please notify the sender immediately by reply e-mail if you have received this e-mail by mistake and delete this e-mail from your system. E-mail transmission cannot be guaranteed to be secure or error-free as information could be intercepted, corrupted, lost, destroyed, arrive late or incomplete, or contain viruses. The sender therefore does not accept liability for any errors or omissions in the contents of this message which arise as a result of e-mail transmission

Message

**From:** Traylor, Patrick [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=B6D06C6B766C4B4B8BFD6B0FEA4B998-TRAYLOR, PA]  
**Sent:** 5/22/2018 6:59:53 PM  
**To:** Hindin, David [Hindin.David@epa.gov]  
**Subject:** Re: Issues I want to learn more about - energy extraction compliance assistance center

## Deliberative Process / Ex. 5

**Patrick Traylor**  
Deputy Assistant Administrator  
Office of Enforcement and Compliance Assurance  
U.S. Environmental Protection Agency  
(202) 564-5238 (office)  
**Ex. 6** (cell)

On May 21, 2018, at 11:35 AM, Hindin, David <Hindin.David@epa.gov> wrote:

## Deliberative Process / Ex. 5

*David A. Hindin*  
Director, Office of Compliance  
Office of Enforcement and Compliance Assurance  
U.S. Environmental Protection Agency, Washington, DC 20460  
Phone 202-564-1300

---

**From:** Traylor, Patrick  
**Sent:** Thursday, May 17, 2018 2:50 PM  
**To:** Hindin, David <Hindin.David@epa.gov>  
**Subject:** FW: Issues I want to learn more about

## Deliberative Process / Ex. 5

**Patrick Traylor**  
Deputy Assistant Administrator  
Office of Enforcement and Compliance Assurance  
U.S. Environmental Protection Agency  
(202) 564-5238 (office)  
**Ex. 6** (cell)

---

**From:** Greenwalt, Sarah  
**Sent:** Thursday, May 17, 2018 2:33 PM  
**To:** A.J. Ferate <aj@feratepllc.com>  
**Cc:** Woods, Clint <woods.clint@epa.gov>; Gunasekara, Mandy <Gunasekara.Mandy@epa.gov>; Bodine, Susan <bodine.susan@epa.gov>; Traylor, Patrick <traylor.patrick@epa.gov>  
**Subject:** RE: Issues I want to learn more about

Good to hear from you, A.J. I've cc'ed Mandy and Clint from the Office of Air and Radiation who should be able to connect you with the right folks regarding the proposed New Owner Clean Air Audit Program.

I've also cc'ed Susan and Patrick from the Office of Enforcement and Compliance Assurance who should be able to connect you with the right folks regarding the proposal for an Energy Extraction Compliance Assistance Center.

Best,

**Sarah A. Greenwalt**

U.S. Environmental Protection Agency

Work: 202-564-1722 | Cell: Ex. 6

[Greenwalt.Sarah@epa.gov](mailto:Greenwalt.Sarah@epa.gov)

---

**From:** A.J. Ferate [<mailto:aj@feratepllc.com>]  
**Sent:** Thursday, May 17, 2018 11:00 AM  
**To:** Greenwalt, Sarah <[greenwalt.sarah@epa.gov](mailto:greenwalt.sarah@epa.gov)>  
**Subject:** Issues I want to learn more about

I hope all is well, Sarah. When I come out next week I'd be interested in meeting with someone whom might have information on:

- a) the proposed New Owner Clean Air Audit Program, and;
- b) the proposal for an Energy Extraction Compliance Assistance Center

I'm putting together my schedule right now, but other than the Judiciary Committee hearing I'm generally open Tuesday afternoon through 11am Thursday.

Thank you in advance! AJF

---

Anthony J. "A.J." Ferate, JD

Ex. 6 cell)



Message

---

**From:** Traylor, Patrick [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=B6D06C6B766C4B4B8BFDF6B0FEA4B998-TRAYLOR, PA]  
**Sent:** 10/1/2018 7:49:39 PM  
**To:** 'Susan Bodine (bodine.susan@epa.gov)' [bodine.susan@epa.gov]  
**Subject:** Weekly Enforcement Briefing Paper  
**Attachments:** OECA Weekly Briefing (October 2, 2018).pdf

**Patrick Traylor**

Deputy Assistant Administrator  
Office of Enforcement and Compliance Assurance  
U.S. Environmental Protection Agency  
(202) 564-5238 (office)

**Ex. 6**

(cell)

Message

---

**From:** Traylor, Patrick [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=B6D06C6B766C4B4B8BFD6B0FEA4B998-TRAYLOR, PA]  
**Sent:** 10/1/2018 5:11:28 PM  
**To:** 'Susan Bodine (bodine.susan@epa.gov)' [bodine.susan@epa.gov]  
**Subject:** Weekly Briefing  
**Attachments:** OECA Weekly Briefing (October 2, 2018).docx

Susan:

I took a shot at drafting the briefing paper for tomorrow (attached).

Deliberative Process / Ex. 5

## Deliberative Process / Ex. 5

Patrick

**Patrick Traylor**  
Deputy Assistant Administrator  
Office of Enforcement and Compliance Assurance  
U.S. Environmental Protection Agency  
(202) 564-5238 (office)

Ex. 6 (cell)

Message

---

**From:** A.J. Ferate [aj@feratepllc.com]  
**Sent:** 5/21/2018 9:16:26 PM  
**To:** Traylor, Patrick [traylor.patrick@epa.gov]  
**Subject:** Re: Issues I want to learn more about

Thank you very much for the note, Patrick. I will make sure I come back out for the Clean Air Audit Program meeting on the 6th.

I appreciate hearing from you, A.J. Ferate

---

Anthony J. "A.J." Ferate, JD

**Ex. 6** (cell)

---

**From:** Traylor, Patrick <traylor.patrick@epa.gov>  
**Sent:** Friday, May 18, 2018 11:32:51 AM  
**To:** A.J. Ferate  
**Subject:** RE: Issues I want to learn more about

A.J.:

As you can imagine, there is a great deal of interest in our proposed New Owner Clean Air Act Audit Program. We are scheduling a meeting with interested state and industry stakeholders on June 6, 2018, in D.C. to talk about the proposal. I have asked my staff to add your name to the invitation list so that you can join us for the discussion.

The Compliance Assistance Center is still in the early stages of development, so I'll need to get back to you on future opportunities to engage with us.

Warm regards,  
Patrick

**Patrick Traylor**  
Deputy Assistant Administrator  
Office of Enforcement and Compliance Assurance  
U.S. Environmental Protection Agency  
(202) 564-5238 (office)  
**Ex. 6** (cell)

---

**From:** A.J. Ferate [mailto:aj@feratepllc.com]  
**Sent:** Thursday, May 17, 2018 2:59 PM  
**To:** Greenwalt, Sarah <greenwalt.sarah@epa.gov>  
**Cc:** Woods, Clint <woods.clint@epa.gov>; Gunasekara, Mandy <Gunasekara.Mandy@epa.gov>; Bodine, Susan <bodine.susan@epa.gov>; Traylor, Patrick <traylor.patrick@epa.gov>  
**Subject:** Re: Issues I want to learn more about

Thank you so much, Sarah. Any opportunity to learn about the proposals would be helpful. Thanks again! AJF

---

Anthony J. "A.J." Ferate, JD

**Ex. 6** (cell)

**From:** Greenwalt, Sarah <[greenwalt.sarah@epa.gov](mailto:greenwalt.sarah@epa.gov)>  
**Sent:** Thursday, May 17, 2018 1:32:30 PM  
**To:** A.J. Ferate  
**Cc:** Woods, Clint; Gunasekara, Mandy; Bodine, Susan; Traylor, Patrick  
**Subject:** RE: Issues I want to learn more about

Good to hear from you, A.J. I've cc'ed Mandy and Clint from the Office of Air and Radiation who should be able to connect you with the right folks regarding the proposed New Owner Clean Air Audit Program.

I've also cc'ed Susan and Patrick from the Office of Enforcement and Compliance Assurance who should be able to connect you with the right folks regarding the proposal for an Energy Extraction Compliance Assistance Center.

Best,

**Sarah A. Greenwalt**

U.S. Environmental Protection Agency  
Work: 202-564-1722 | Cell: Ex. 6  
[Greenwalt.Sarah@epa.gov](mailto:Greenwalt.Sarah@epa.gov)

---

**From:** A.J. Ferate [<mailto:aj@feratepllc.com>]  
**Sent:** Thursday, May 17, 2018 11:00 AM  
**To:** Greenwalt, Sarah <[greenwalt.sarah@epa.gov](mailto:greenwalt.sarah@epa.gov)>  
**Subject:** Issues I want to learn more about

I hope all is well, Sarah. When I come out next week I'd be interested in meeting with someone whom might have information on:

- a) the proposed New Owner Clean Air Audit Program, and;
- b) the proposal for an Energy Extraction Compliance Assistance Center

I'm putting together my schedule right now, but other than the Judiciary Committee hearing I'm generally open Tuesday afternoon through 11am Thursday.

Thank you in advance! AJF

---

Anthony J. "A.J." Ferate, JD  
Ex. 6 (cell)

Message

---

**From:** Traylor, Patrick [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=B6D06C6B766C4B4B8BFDF6B0FEA4B998-TRAYLOR, PA]  
**Sent:** 5/21/2018 3:09:30 PM  
**To:** Susan Bodine (bodine.susan@epa.gov) [bodine.susan@epa.gov]  
**Subject:** OECA DAA Project Management Report (May 21, 2018)  
**Attachments:** OECA DAA Project Management Report (May 21, 2018).docx

Please find attached a brief summary of the various projects that I have on my desk.

**Patrick Traylor**

Deputy Assistant Administrator  
Office of Enforcement and Compliance Assurance  
U.S. Environmental Protection Agency  
(202) 564-5238 (office)  

**Ex. 6** cell)

Message

---

**From:** Bodine, Susan [bodine.susan@epa.gov]  
**Sent:** 10/11/2018 3:30:57 PM  
**To:** Hull, George [Hull.George@epa.gov]  
**CC:** Traylor, Patrick [traylor.patrick@epa.gov]; Egan, Patrick [egan.patrick@epa.gov]; Starfield, Lawrence [Starfield.Lawrence@epa.gov]  
**Subject:** enforcement talking points  
**Attachments:** Tlkg Pts for Administrator at CEEC 9-10-18.docx; Susan\_newsletter\_draft 6 22 18 (+CS edits) clean copy.docx

Message

---

**From:** Chapman, Apple [Chapman.Apple@epa.gov]  
**Sent:** 2/27/2018 4:07:00 PM  
**To:** Traylor, Patrick [traylor.patrick@epa.gov]  
**Subject:** RE: Schedule Change

Ok. Sounds good.

*Ms. Apple Chapman* | Deputy Director, Air Enforcement Division | U.S. Environmental Protection Agency  
1200 Pennsylvania Ave. NW, Washington DC, 20004 | 202-564-5666 (office) [Ex. 6] (mobile) |

---

**From:** Traylor, Patrick  
**Sent:** Tuesday, February 27, 2018 11:06 AM  
**To:** Chapman, Apple <Chapman.Apple@epa.gov>  
**Subject:** Schedule Change

You probably know that Clint, Lee, and I will have our brief panel conversation this morning. That will therefore happen before the presentation of Case Study 2 from Range. So I'll raise the O&G audit program briefly during my remarks.

**Patrick Traylor**  
Deputy Assistant Administrator  
Office of Enforcement and Compliance Assurance  
U.S. Environmental Protection Agency  
(202) 564-5238 (office)  
[Ex. 6] (cell)

Message

---

**From:** Bodine, Susan [bodine.susan@epa.gov]  
**Sent:** 11/14/2018 9:37:02 PM  
**To:** Hull, George [Hull.George@epa.gov]; Shiffman, Cari [Shiffman.Cari@epa.gov]; Branning, Hannah [Branning.Hannah@epa.gov]  
**CC:** Starfield, Lawrence [Starfield.Lawrence@epa.gov]; Traylor, Patrick [traylor.patrick@epa.gov]  
**Subject:** AAW talking points for OECA all hands  
**Attachments:** OECA All Hands Talking Points Nov 7.docx



Message

---

**From:** Chapman, Apple [Chapman.Apple@epa.gov]  
**Sent:** 4/18/2018 11:47:15 AM  
**To:** Traylor, Patrick [traylor.patrick@epa.gov]; Morrison, Matthew W. [matthew.morrison@pillsburylaw.com]  
**Subject:** RE: Range Resources Visit; Audit / New Owner Policies

Matt,  
Give me a call anytime to discuss schedules. Thanks.

*Ms. Apple Chapman* | Deputy Director, Air Enforcement Division | U.S. Environmental Protection Agency  
1200 Pennsylvania Ave. NW, Washington DC, 20004 | 202-564-5666 (office) **Ex. 6** (mobile) |

---

**From:** Traylor, Patrick  
**Sent:** Friday, April 13, 2018 12:11 PM  
**To:** Morrison, Matthew W. <matthew.morrison@pillsburylaw.com>  
**Cc:** Chapman, Apple <Chapman.Apple@epa.gov>  
**Subject:** RE: Range Resources Visit; Audit / New Owner Policies

Matt:

Thank you for the note and for the invitation.

Regarding a site visit, regretfully, I wouldn't be able to make it out into the field until mid-June. This is the season for our regional visits, and so I'll be on the road two or three days a week until then. I could be available the weeks of June 11 or 18.

Regarding a meeting in DC or a teleconference to discuss our O&G sector audit program, given the delay in a site visit, I'd ask that you work with Apple Chapman to set something up at a mutually-convenient sooner time.

Warm regards,  
Patrick

**Patrick Traylor**  
Deputy Assistant Administrator  
Office of Enforcement and Compliance Assurance  
U.S. Environmental Protection Agency  
(202) 564-5238 (office)  
**Ex. 6** (cell)

---

**From:** Morrison, Matthew W. [mailto:matthew.morrison@pillsburylaw.com]  
**Sent:** Tuesday, April 10, 2018 6:23 PM  
**To:** Traylor, Patrick <traylor.patrick@epa.gov>  
**Subject:** Range Resources Visit; Audit / New Owner Policies

Hi Patrick – I'm very sorry to have bothered you on your cell this afternoon. I had asked your assistant for your voicemail, and somehow she patched me through to your cell.

In any event, I wanted to touch base on two fronts – the site visits and the Audit / New Owner Policy discussions.

On the site visits, Cosmo Servidio (the Region III RA) indicated a desire to tour two or three of Range's facilities in the Marcellus Shale. We indicated to Cosmo that we might be putting together a similar tour for you, and Cosmo suggested that we combine the visits. That's fine with us. We would propose mid-May or later in the month if that works for everyone. If you tell us which dates work with you, we can provide those to Cosmo. Other OECA folks (Susan, Phil, Apple, etc.) would be welcome, too.

On the policy discussions, we are happy to share lessons learned from our foray into the New Owner Policy. Just let us know if and when you'd like to get together by phone or in person. We could combine the site tours with a working lunch discussion of the policies if that's okay with you, too.

Thanks very much,

Matt

Matthew W. Morrison | Partner  
Pillsbury Winthrop Shaw Pittman LLP  
1200 Seventeenth Street NW | Washington, DC 20036-3006  
t [Ex. 6] f 202.663.8007 | m [Ex. 6]  
matthew.morrison@pillsburylaw.com | website bio

ABU DHABI ALSTIN BEIJING DUBAI HONG KONG HOUSTON LONDON  
LOS ANGELES MIAMI NASHVILLE NEW YORK NORTHERN VIRGINIA  
PALM BEACH SACRAMENTO SAN DIEGO SAN DIEGO NORTH COUNTY  
SAN FRANCISCO SHANGHAI SILICON VALLEY TOKYO WASHINGTON, DC



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Message

---

**From:** Chapman, Apple [Chapman.Apple@epa.gov]  
**Sent:** 9/24/2018 5:35:15 PM  
**To:** Traylor, Patrick [traylor.patrick@epa.gov]  
**CC:** Fried, Gregory [Fried.Gregory@epa.gov]; Sullivan, Tim [Sullivan.Tim@epa.gov]; Hoyt, Daniel [Hoyt.Daniel@epa.gov]; Williams, Christopher [Williams.Christopher@epa.gov]; Brooks, Phillip [Brooks.Phillip@epa.gov]  
**Subject:** Updated OG NOAP Presentation  
**Attachments:** DRAFT API Presentation 9\_21\_2018\_rev9.pdf

Patrick,

We revised the slide presentation in preparation for our meeting tomorrow

**Deliberative Process / Ex. 5**

**Deliberative Process / Ex. 5**

Thanks.

Message

---

**From:** Bodine, Susan [bodine.susan@epa.gov]  
**Sent:** 3/19/2018 1:08:38 PM  
**To:** Ferguson, Lincoln [ferguson.lincoln@epa.gov]  
**CC:** Traylor, Patrick [traylor.patrick@epa.gov]; Jackson, Ryan [jackson.ryan@epa.gov]  
**Subject:** Weekly Enforcement Meeting  
**Attachments:** Enforcement/Investigatory / Ex. 7(a) OECA Weekly Briefing (March 20 2018).docx

Lincoln,

Attached are materials for tomorrow's enforcement meeting with the Administrator.

Susan

Susan Parker Bodine  
Assistant Administrator  
Office of Enforcement and Compliance Assurance  
202-564-2440

This message is CONFIDENTIAL, and may contain legally privileged information. If you are not the intended recipient, or believe you received this communication in error, please delete it immediately, do not copy, and notify the sender.  
Thank you.

Message

---

**From:** Traylor, Patrick [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=B6D06C6B766C4B4B8BFD6B0FEA4B998-TRAYLOR, PA]  
**Sent:** 4/14/2018 2:30:06 AM  
**To:** Porter, Amy [Porter.Amy@epa.gov]  
**CC:** Kelley, Rosemarie [Kelley.Rosemarie@epa.gov]  
**Subject:** Fwd: Refresh on EPA Disclosure Programs  
**Attachments:** Refresh Announcement for Disclosures 4-13-18 noon clean (002) (PDT edits).docx; ATT00001.htm

My edits.

**Patrick Traylor**  
Deputy Assistant Administrator  
Office of Enforcement and Compliance Assurance  
U.S. Environmental Protection Agency  
(202) 564-5238 (office)

**Ex. 6** cell

---

**From:** Porter, Amy  
**Sent:** Friday, April 13, 2018 12:58 PM  
**To:** Bodine, Susan <[bodine.susan@epa.gov](mailto:bodine.susan@epa.gov)>; Traylor, Patrick <[traylor.patrick@epa.gov](mailto:traylor.patrick@epa.gov)>; Starfield, Lawrence <[Starfield.Lawrence@epa.gov](mailto:Starfield.Lawrence@epa.gov)>  
**Cc:** Kelley, Rosemarie <[Kelley.Rosemarie@epa.gov](mailto:Kelley.Rosemarie@epa.gov)>; Theis, Joseph <[Theis.Joseph@epa.gov](mailto:Theis.Joseph@epa.gov)>; Hull, George <[Hull.George@epa.gov](mailto:Hull.George@epa.gov)>; Jones, Gary <[Jones.Gary@epa.gov](mailto:Jones.Gary@epa.gov)>; Milton, Philip <[Milton.Philip@epa.gov](mailto:Milton.Philip@epa.gov)>  
**Subject:** Refresh on EPA Disclosure Programs

Susan, Patrick, and Larry -

Please see attached redraft of the "Refresh" piece for the disclosure program. **Deliberative Process / Ex. 5**

**Deliberative Process / Ex. 5**

Please let me know if you have any questions.

Thank you

Amy Porter, Director

Crosscutting Policy Staff

Office of Civil Enforcement

US Environmental Protection Agency

202-564-2431

Message

---

**From:** Traylor, Patrick [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=B6D06C6B766C4B4B8BFD6B0FEA4B998-TRAYLOR, PA]  
**Sent:** 10/18/2018 3:13:51 PM  
**To:** Chapman, Apple [Chapman.Apple@epa.gov]  
**Subject:** RE: O&G Audit Program

## Personal Matters / Ex. 6

**Patrick Traylor**  
Deputy Assistant Administrator  
Office of Enforcement and Compliance Assurance  
U.S. Environmental Protection Agency

Ex. 6 (m)  
202.564.5238 (o)

---

**From:** Chapman, Apple  
**Sent:** Thursday, October 18, 2018 10:20 AM  
**To:** Traylor, Patrick <traylor.patrick@epa.gov>  
**Subject:** RE: O&G Audit Program

I probably forgot to send it. I am working from home today.

Personal Matters / Ex. 6

Deliberative Process / Ex. 5

Deliberative Process / Ex. 5 I hope to get it up to you for your review next week.

Thanks.

*Ms. Apple Chapman* [Deputy Director, Air Enforcement Division | U.S. Environmental Protection Agency  
1200 Pennsylvania Ave. NW, Washington DC, 20004 | 202-564-5666 (office) |

Ex. 6 (mobile) |

---

**From:** Traylor, Patrick  
**Sent:** Wednesday, October 17, 2018 3:05 PM  
**To:** Chapman, Apple <Chapman.Apple@epa.gov>  
**Subject:** O&G Audit Program

Apple:

## Deliberative Process / Ex. 5

Patrick

**Patrick Traylor**  
Deputy Assistant Administrator  
Office of Enforcement and Compliance Assurance  
U.S. Environmental Protection Agency

Ex. 6 (m)  
202.564.5238 (o)

Message

---

**From:** Chapman, Apple [Chapman.Apple@epa.gov]  
**Sent:** 4/25/2018 6:41:10 PM  
**To:** Traylor, Patrick [traylor.patrick@epa.gov]; Lee Fuller [lfuller@ipaa.org]  
**Subject:** RE: EPA Self Audit Program

Thanks, Patrick.

Lee, I will follow up with you later this week to discuss getting IPAA input on the program we are developing.

Apple

*Ms. Apple Chapman* | Deputy Director, Air Enforcement Division | U.S. Environmental Protection Agency  
1200 Pennsylvania Ave. NW, Washington DC, 20004 | 202-564-5666 (office) | **Ex. 6** mobile |

---

**From:** Traylor, Patrick  
**Sent:** Wednesday, April 25, 2018 2:25 PM  
**To:** Lee Fuller <lfuller@ipaa.org>  
**Cc:** Chapman, Apple <Chapman.Apple@epa.gov>  
**Subject:** RE: EPA Self Audit Program

Lee:

Thanks for reaching out to us on this; I think the input of trade associations will be an important part of our stakeholder engagement efforts. I've asked Apple Chapman to work with IPAA to discuss the program we are developing.

Warm regards,  
Patrick

**Patrick Traylor**  
Deputy Assistant Administrator  
Office of Enforcement and Compliance Assurance  
U.S. Environmental Protection Agency  
(202) 564-5238 (office)  
**Ex. 6** (cell)

---

**From:** Lee Fuller [mailto:lfuller@ipaa.org]  
**Sent:** Monday, April 23, 2018 3:30 PM  
**To:** Traylor, Patrick <traylor.patrick@epa.gov>  
**Subject:** EPA Self Audit Program

Patrick,

You had expressed an interest in meeting to discuss the EPA self audit program and I've seen several press reports on the effort. Do you still want to meet?

Thanks,

Lee Fuller



Message

---

**From:** Lee Fuller [lfuller@ipaa.org]  
**Sent:** 4/25/2018 6:26:23 PM  
**To:** Traylor, Patrick [traylor.patrick@epa.gov]  
**Subject:** Re: EPA Self Audit Program

Thanks, Patrick.

Sent from my iPhone

On Apr 25, 2018, at 2:25 PM, Traylor, Patrick <[traylor.patrick@epa.gov](mailto:traylor.patrick@epa.gov)> wrote:

Lee:

Thanks for reaching out to us on this; I think the input of trade associations will be an important part of our stakeholder engagement efforts. I've asked Apple Chapman to work with IPAA to discuss the program we are developing.

Warm regards,  
Patrick

**Patrick Traylor**  
Deputy Assistant Administrator  
Office of Enforcement and Compliance Assurance  
U.S. Environmental Protection Agency  
(202) 564-5238 (office)  

Ex. 6

 (cell)

---

**From:** Lee Fuller [<mailto:lfuller@ipaa.org>]  
**Sent:** Monday, April 23, 2018 3:30 PM  
**To:** Traylor, Patrick <[traylor.patrick@epa.gov](mailto:traylor.patrick@epa.gov)>  
**Subject:** EPA Self Audit Program

Patrick,

You had expressed an interest in meeting to discuss the EPA self audit program and I've seen several press reports on the effort. Do you still want to meet?

Thanks,

Lee Fuller

Message

---

**From:** Loving, Shanita [Loving.Shanita@epa.gov]  
**Sent:** 4/25/2018 4:43:15 PM  
**To:** Traylor, Patrick [traylor.patrick@epa.gov]  
**Subject:** FW: Revised EE NEI PPT for AA Briefing - For Exec Board Review - final comments from David Hindin  
**Attachments:** Energy Extraction and Production NEI AA Briefing 4 24 18.pptx

Please see attached for tomorrow's NEI briefing.

Thanks,

Shanita Loving  
Program Specialist  
Environmental Protection Agency  
IO of the Assist. Administrator of the Office of Enforcement & Compliance Assurance  
1200 Pennsylvania Ave., NW  
WJC-South, Room 3204  
Washington, DC 20460  
Phone: (202) 564-4728

---

**From:** Palmer, Daniel  
**Sent:** Wednesday, April 25, 2018 12:32 PM  
**To:** Loving, Shanita <Loving.Shanita@epa.gov>  
**Subject:** FW: Revised EE NEI PPT for AA Briefing - For Exec Board Review - final comments from David Hindin

Shanita,

Attached is the presentation for the briefing tomorrow for Susan on the Energy Extraction National Enforcement Initiative. Please provide to Susan, Larry and Patrick.

Please let me know if you have any questions.

Thank you.

Daniel Palmer, Deputy Director  
Planning, Measures and Oversight Division  
OECA/Office of Compliance  
(202) 564-5034

---

**From:** Lischinsky, Robert  
**Sent:** Tuesday, April 24, 2018 7:06 PM  
**To:** Palmer, Daniel <Palmer.Daniel@epa.gov>  
**Cc:** McKeever, Michele <McKeever.Michele@epa.gov>; Chapman, Apple <Chapman.Apple@epa.gov>; Patefield, Scott <Patefield.Scott@epa.gov>; Mia, Marcia <Mia.Marcia@epa.gov>; Fried, Gregory <Fried.Gregory@epa.gov>  
**Subject:** FW: Revised EE NEI PPT for AA Briefing - For Exec Board Review - final comments from David Hindin

Dan,

David's comments provided below have been addressed in the attached updated PowerPoint. Edits were made to the slides now numbered 2, 3, 5, 12, 14, 16.

If anything else is needed, please let me know.

Thanks.

Rob

---

**From:** Hindin, David

**Sent:** Tuesday, April 24, 2018 5:10 PM

**To:** Palmer, Daniel <Palmer.Daniel@epa.gov>; Cozad, David <Cozad.David@epa.gov>; Kelley, Rosemarie <Kelley.Rosemarie@epa.gov>; Lischinsky, Robert <Lischinsky.Robert@epa.gov>

**Cc:** Porter, Amy <Porter.Amy@epa.gov>; McKeever, Michele <McKeever.Michele@epa.gov>; Theis, Joseph <Theis.Joseph@epa.gov>; LaBoda, Sarah <LaBoda.Sarah@epa.gov>

**Subject:** RE: Revised EE NEI PPT for AA Briefing - For Exec Board Review - final comments from David Hindin

Here are my comments.

# Deliberative Process / Ex. 5

*David A. Hindin*

Director, Office of Compliance

Office of Enforcement and Compliance Assurance

U.S. Environmental Protection Agency, Washington, DC 20460

Phone 202-564-1300

---

**From:** Palmer, Daniel

**Sent:** Tuesday, April 24, 2018 2:44 PM

**To:** Hindin, David <Hindin.David@epa.gov>; Cozad, David <Cozad.David@epa.gov>; Kelley, Rosemarie <Kelley.Rosemarie@epa.gov>

**Cc:** Porter, Amy <Porter.Amy@epa.gov>; McKeever, Michele <McKeever.Michele@epa.gov>; Theis, Joseph <Theis.Joseph@epa.gov>; LaBoda, Sarah <LaBoda.Sarah@epa.gov>; Lischinsky, Robert <Lischinsky.Robert@epa.gov>

**Subject:** Revised EE NEI PPT for AA Briefing - For Exec Board Review, Input Due COB Monday, 4/23

For Exec Board review.

The PPT is due to OECA IO tomorrow for the 11:15 am AA briefing on Thursday. So ... get me comments by COB today if possible. **(Please send them to Rob Lischinsky, too, as I leave at 4 pm today.)**

Thanks.

Daniel Palmer, Deputy Director  
Planning, Measures and Oversight Division  
OECA/Office of Compliance  
(202) 564-5034

---

**From:** Lischinsky, Robert  
**Sent:** Tuesday, April 24, 2018 1:24 PM  
**To:** Palmer, Daniel <Palmer.Daniel@epa.gov>  
**Cc:** McKeever, Michele <McKeever.Michele@epa.gov>; Chapman, Apple <Chapman.Apple@epa.gov>; Patefield, Scott <Patefield.Scott@epa.gov>; Mia, Marcia <Mia.Marcia@epa.gov>; Fried, Gregory <Fried.Gregory@epa.gov>  
**Subject:** RE: EE NEI PPT for AA Briefing - For Exec Board Review, Input Due COB Monday, 4/23

Dan,

On behalf of the EEPI SIT, attached is the revised PowerPoint presentation for the AA. **Deliberative Process / Ex. 5**

## Deliberative Process / Ex. 5

If you or the Executive Board have any questions or would like additional information, please let us know.

## Deliberative Process / Ex. 5

Thanks.

Rob

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**From:** Palmer, Daniel  
**Sent:** Monday, April 23, 2018 1:01 PM  
**To:** Lischinsky, Robert <Lischinsky.Robert@epa.gov>  
**Subject:** FW: EE NEI PPT for AA Briefing - For Exec Board Review, Input Due COB Monday, 4/23

Rob,

See David Hindin's comments below and attached.

Can you all have a revised version for the board to review by noon tomorrow? **Deliberative Process / Ex. 5**

Daniel Palmer, Deputy Director  
Planning, Measures and Oversight Division  
OECA/Office of Compliance  
(202) 564-5034

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**From:** Hindin, David

**Sent:** Monday, April 23, 2018 11:30 AM

**To:** Cozad, David <Cozad.David@epa.gov>; Palmer, Daniel <Palmer.Daniel@epa.gov>; Kelley, Rosemarie <Kelley.Rosemarie@epa.gov>; Porter, Amy <Porter.Amy@epa.gov>

**Subject:** RE: EE NEI PPT for AA Briefing - For Exec Board Review, Input Due COB Monday, 4/23

I agree with comments. I have marked up the slides with comment bubbles.

**Deliberative Process / Ex. 5**

**Deliberative Process / Ex. 5**

*David A. Hindin*

Director, Office of Compliance

Office of Enforcement and Compliance Assurance

U.S. Environmental Protection Agency, Washington, DC 20460

Phone 202-564-1300

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**From:** Cozad, David

**Sent:** Friday, April 20, 2018 9:50 PM

**To:** Palmer, Daniel <Palmer.Daniel@epa.gov>; Hindin, David <Hindin.David@epa.gov>; Kelley, Rosemarie <Kelley.Rosemarie@epa.gov>; Porter, Amy <Porter.Amy@epa.gov>

**Subject:** Fwd: EE NEI PPT for AA Briefing - For Exec Board Review, Input Due COB Monday, 4/23

**Subject: RE: EE NEI PPT for AA Briefing - For Exec Board Review, Input Due COB Monday, 4/23**

**Deliberative Process / Ex. 5**

Message

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**From:** Chapman, Apple [Chapman.Apple@epa.gov]  
**Sent:** 10/18/2018 2:19:49 PM  
**To:** Traylor, Patrick [traylor.patrick@epa.gov]  
**Subject:** RE: O&G Audit Program  
**Attachments:** OG New Owner Program - Summary of Stakeholder Comments - Rev Draft\_10.03.2018.docx

I probably forgot to send it. I am working from home today. **Personal Matters / Ex. 6**  
**Deliberative Process / Ex. 5**

**Deliberative Process / Ex. 5** I hope to get it up to you for your review next week.  
Thanks.

*Ms. Apple Chapman* | Deputy Director, Air Enforcement Division | U.S. Environmental Protection Agency  
1200 Pennsylvania Ave. NW, Washington DC, 20004 | 202-564-5666 (office) | **Ex. 6** (mobile) |

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**From:** Traylor, Patrick  
**Sent:** Wednesday, October 17, 2018 3:05 PM  
**To:** Chapman, Apple <Chapman.Apple@epa.gov>  
**Subject:** O&G Audit Program

Apple:

**Deliberative Process / Ex. 5**

Patrick

**Patrick Traylor**  
Deputy Assistant Administrator  
Office of Enforcement and Compliance Assurance  
U.S. Environmental Protection Agency  
**Ex. 6** (m)  
202.564.5238 (o)

Message

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**From:** Traylor, Patrick [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=B6D06C6B766C4B4B8BFD6B0FEA4B998-TRAYLOR, PA]  
**Sent:** 3/16/2018 7:17:00 PM  
**To:** Susan Bodine (bodine.susan@epa.gov) [bodine.susan@epa.gov]  
**Subject:** Weekly Enforcement  
**Attachments:** OECA Weekly Briefing (March 20, 2018).docx; Enforcement/Investigatory / Ex. 7(a)

Draft briefing Enforcement/Investigatory / Ex. 7(a) I need to step out for a bit, but will be back in the office by 4:15 or so.

**Patrick Traylor**

Deputy Assistant Administrator  
Office of Enforcement and Compliance Assurance  
U.S. Environmental Protection Agency  
(202) 564-5238 (office)  
Ex. 6 cell)

## Appointment

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**From:** Bodine, Susan [bodine.susan@epa.gov]  
**Sent:** 2/12/2018 2:44:12 PM  
**To:** Bodine, Susan [bodine.susan@epa.gov]; Joseph Theis [Theis.Joseph@epa.gov]; Porter, Amy [Porter.Amy@epa.gov]; Jonesi, Gary [Jonesi.Gary@epa.gov]; Milton, Philip [Milton.Philip@epa.gov]; Phillip Brooks [Brooks.Phillip@epa.gov]; Chapman, Apple [Chapman.Apple@epa.gov]; Kelley, Rosemarie [Kelley.Rosemarie@epa.gov]; Traylor, Patrick [traylor.patrick@epa.gov]  
**CC:** Starfield, Lawrence [Starfield.Lawrence@epa.gov]; Sullivan, Tim [Sullivan.Tim@epa.gov]; Fried, Gregory [Fried.Gregory@epa.gov]  
**Subject:** EPAs Self Disclosure Program  
**Location:** 3126 WJC-South  
**Start:** 2/16/2018 4:15:00 PM  
**End:** 2/16/2018 5:30:00 PM  
**Show Time As:** Busy